

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

ELIZABETH SINES, SETH )  
WISPEL WEY, MARISSA )  
BLAIR, TYLER MAGILL, )  
APRIL MUNIZ HANNAH )  
PEARCE, MARCUS MARTIN, )  
NATALIE ROMERO, CHELSEA )  
ALVARADO, AND JOHN DOE, )

Plaintiffs, )

vs. )

JASON KESSLER, RICHARD )  
SPENCER, CHRISTOPHER )  
CANTWELL, JAMES ALEX )  
FIELDS, JR., VANGUARD )  
AMERICA, ANDREW ANGLIN, )  
MOONBASE HOLDINGS, LLC, )  
ROBERT "AZZMADOR" RAY, )  
NATHAN DAMIGO, ELLIOT )  
KLINE A/K/A ELI MOSLEY, )  
IDENTITY EVROPA, MATTHEW )  
HEIMBACH, MATTHEW PARROTT )  
A/K/A DAVID MATTHEW )  
PARROTT, TRADITIONALIST )  
WORKER PARTY, MICHAEL )  
HILL, MICHEL TUBBS, )  
LEAGUE OF THE SOUTH, JEFF )  
SCHOEP, NATIONAL SOCIALIST )  
MOVEMENT, NATIONAL FRONT, )  
AUGUSTUS SOL INVICTUS, )  
FRATERNAL ORDER OF THE )  
ALT-KNIGHTS, MICHAEL )  
"ENOCH" PEINOVICH, LOYAL )  
WHITE KNIGHTS OF THE )  
KU KLUX KLAN, AND EAST )  
COAST KNIGHTS OF THE )  
KU KLUX KLAN A/K/A )  
EAST COAST KNIGHTS OF THE )  
TRUE INVISIBLE EMPIRE, )

Defendants. )

CIVIL ACTION FILE

NO: 3:17-CV-00072-NKM

JAMES MICHAEL HILL

JUNE 18, 2020

1  
2 VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
3 JAMES MICHAEL HILL  
4 30(B)(6) CAPACITY FOR LEAGUE OF THE SOUTH  
5 KILLEN, ALABAMA  
6 THURSDAY, JUNE 18, 2020  
7  
8

9 (Reported Remotely)  
10  
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12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

23 REPORTED BY: TANYA L. VERHOVEN-PAGE,  
24 CCR-B-1790

25 JOB NO: 180542

June 18, 2020

8:28 a.m.

Videotaped Videoconference deposition of  
JAMES MICHAEL HILL IN A 30(B)(6) CAPACITY FOR  
LEAGUE OF THE SOUTH, held in Killen, Alabama  
before Tanya L. Verhoven-Page, Certified Court  
Reporter and Notary Public of the State of  
Alabama.

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THE VIDEOGRAPHER: Lem Lattimer

- - -

I N D E X

WITNESS: JAMES MICHAEL HILL

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Exhibit 34

Free Magnolia, Volume  
13, No. 3

250

(Hill Deposition Exhibit No. 33 was not marked for  
the record.)

1 J.M. HILL

2 KILLEN, ALABAMA; THURSDAY, JUNE 18, 2020

3 8:28 A.M.

4  
5 P R O C E E D I N G S

6  
7 THE VIDEOGRAPHER: Good morning,  
8 counselors. My name is Lem Lattimer. I  
9 am a legal videographer in association  
10 with TSG Reporting.

11 Due to the severity of COVID-19 and  
12 following the practice of social  
13 distancing, I will not be in the same  
14 room with the witness. Instead, I'll  
15 record this videotaped deposition  
16 remotely.

17 The reporter, Tanya Page, also will  
18 not be in the same room and will swear  
19 the witness in remotely.

20 Do all parties stipulate to the  
21 validity of this video recording and  
22 remote swearing and that it will be  
23 admissible in the courtroom as if it had  
24 been taken following Rule 30 of the  
25 Federal Rules of Civil Procedures and the

1 J.M. HILL

2 State's rules where this case is pending?

3 MR. LEVINE: Yes, for the  
4 Plaintiffs.

5 MR. JONES: Yes, for the Defense.

6 THE VIDEOGRAPHER: Thank you.

7 This is the start of video label  
8 Number One in the video recorded  
9 deposition of Michael Hill in the matter  
10 of Elizabeth Sines, et al., versus Jason  
11 Kessler, et al., on June the 18th, 2020  
12 at approximately 9:29 a.m.

13 All appearances are noted on the  
14 record.

15 Will the court reporter please  
16 swear the witness in.

17

18 Thereupon --

19 MICHAEL HILL,  
20 called as a witness, having been first duly sworn,  
21 was examined and testified as follows:

22

23 EXAMINATION

24 BY MR. LEVINE:

25 Q Good morning, Mr. Hill.

1 J.M. HILL

2 A Good morning, sir.

3 Q Please spell your name for the record.

4 A My name is James, J-A-M-E-S, Michael,  
5 M-I-C-H-A-E-L, Hill, H-I-L-L.

6 Q My name is Alan Levine, and I am a senior  
7 counsel at the law firm Cooley, LLP in New York, and  
8 I represent the Plaintiffs in this lawsuit Sines V  
9 Kessler.

10 Let's just do a few introductory matters  
11 first, before we get into the substance of the  
12 deposition.

13 Have you ever been deposed before,  
14 Mr. Hill?

15 A No. This is the first time.

16 Q Have you ever testified in court?

17 A I haven't testified in court. I did  
18 testify in a -- a hearing at one time, but I don't  
19 think that I would call it court, but -- so I would  
20 say probably not.

21 Q How long ago was that?

22 A It was a couple years. Two, maybe three  
23 years. A friend of mine was being evaluated by the  
24 city that he worked for and they wanted me to give  
25 some testimony regarding him.

1 J.M. HILL

2 I don't think it was a real court  
3 proceeding. I think it was mainly just a hearing on  
4 the part of the city, but I was questioned by the  
5 city attorney. So --

6 Q So just, then, ground rules for this  
7 proceeding.

8 A court reporter, as you just heard, is  
9 transcribing everything that is being said. Please  
10 speak slowly and clearly so the court reporter can  
11 record everything that's being said. And I will make  
12 an effort to wait until you finish speaking before I  
13 speak, and I ask you to do the same. Understood?

14 A Very well, sir.

15 Q It's important that you give verbal  
16 responses to the questions so that the court reporter  
17 can record them. Is that clear?

18 A That's clear.

19 Q And if you don't understand a question  
20 that I ask, please let me know, and I will do my best  
21 to rephrase it. And if you tell me that you don't  
22 understand, then I will rephrase it.

23 Do you understand?

24 A I understand, sir.

25 Q You have a lawyer present representing

1 J.M. HILL

2 you; isn't that right?

3 A That is correct, sir.

4 Q And his name is Bryan Jones; is that  
5 correct?

6 A That is correct, sir.

7 Q He's a member of the Virginia bar, as I  
8 understand; is that correct?

9 A That is correct.

10 Q So Mr. Jones is here today and he has the  
11 right on your behalf to enter any objections to any  
12 questions that I may ask. And he knows, and I know,  
13 under the Federal Rules of Civil Procedure the nature  
14 of those objections that are permissible and how to  
15 make them. And so we need to give Mr. Jones an  
16 opportunity to make an objection after a question  
17 that I ask.

18 Do you understand that?

19 A Understood, sir.

20 Q So we'll just pause after I ask you a  
21 question to give Mr. Jones an opportunity to  
22 interpose an objection. Okay? Do you understand?

23 A I understand, sir.

24 Q Okay. Now, also, you've just taken an  
25 oath and sworn to tell the truth at this deposition;

1 J.M. HILL

2 is that understood?

3 A Yes, sir, understood.

4 Q Are you under the influence of any  
5 medication or drug that would affect your ability to  
6 testify truthfully and accurately today?

7 A No, sir.

8 Q Is there any other reason that you may  
9 not be able to testify truthfully and accurately?

10 A There is no reason, sir.

11 (Hill Deposition Exhibit No. 1 was  
12 marked for the record.)

13 BY MR. LEVINE:

14 Q So I want to put up on the screen the  
15 first page of a document called the Second Amended  
16 Complaint. And this was filed in the Federal Court  
17 in the Charlottesville, Virginia division.

18 Have you seen this document before?

19 A I have, sir.

20 Q And have you reviewed it?

21 A I've reviewed it. My attorney sent me a  
22 copy of it and I reviewed it.

23 Q And do you understand that I represent  
24 the plaintiffs in this caption and that you are here  
25 to testify on your own behalf and on behalf of the

1 J.M. HILL

2 entity League of the South in this case?

3 A I understand that, sir.

4 Q And you understand that we have noticed  
5 this deposition for you to appear both individually  
6 and on behalf of League of the South?

7 A Yes.

8 Q Okay. Did you do anything to prepare for  
9 today's deposition?

10 A I read over the document that you've just  
11 put on the screen. I reviewed the notes that I had  
12 made -- taken during discovery of the things that I  
13 had provided. I spoke with Attorney Jones about the  
14 technological matters of getting this set up this  
15 morning. And that's pretty much what I've done.

16 Q Have you spoken to anybody else in  
17 connection with your preparation for this deposition?

18 A No, sir. No, sir, I have not, only  
19 Attorney Jones.

20 Q Have you and Michael Tubbs talked about  
21 this deposition?

22 A No, sir. We have not.

23 Q You know he's being deposed tomorrow in  
24 this case, correct?

25 A So I've learned from Attorney Jones, yes.



1 J.M. HILL

2 Q And have you and Tubbs talked about your  
3 depositions?

4 A No, sir, we have not talked about the  
5 deposition.

6 MR. LEVINE: Okay. I'm going to  
7 put up on the screen Exhibit 2 to mark.

8 (Hill Deposition Exhibit No. 2 was  
9 marked for the record.)

10 MS. LIVERZANI: This is Amanda  
11 Liverzani for the Plaintiff. Can we  
12 please go off the record.

13 (Discussion held off the record.)

14 THE VIDEOGRAPHER: The time is  
15 8:37 p.m. We're off the record.

16 (Recess taken.)

17 THE VIDEOGRAPHER: The time is  
18 9:56 a.m. We're on the record.

19 MR. LEVINE: So we're back on the  
20 record.

21 BY MR. LEVINE:

22 Q Mr. Hill, I'm marking Exhibit 2, which  
23 is -- which is entitled the second interrogatories,  
24 Plaintiff's Second Interrogatories. And I ask you  
25 if -- if you were provided those answers to

1 J.M. HILL

2 interrogatories on or about March 9, 2000 [sic], on  
3 behalf of you, yourself and League of the South?

4 A I did provide these. I am -- I would  
5 just be guessing at the date, but I did provide them  
6 to my attorney.

7 Q And I'm just holding up -- it's your  
8 signature? Can you see --

9 A Mark, let me -- let me click. Oh, yes, I  
10 see that. Yes, that appears to be my signature.

11 Q Okay. And the identical signature was on  
12 the answers on behalf of the League of the South.  
13 Those documents, those two answers that were signed  
14 by you did not contain the words "under penalty of  
15 perjury."

16 Do you swear that these answers are true  
17 and correct?

18 A These answers are true and correct to the  
19 best of my ability to give them, sir.

20 Q Thank you. Just a few personal --  
21 typical personal questions, Mr. Hill.

22 Have you ever had a different legal name?

23 A No, sir, I have not.

24 Q Where did you grow up?

25 A I was born in Winfield, Alabama, in

1 J.M. HILL

2 Marion County. I grew up in that area and have lived  
3 in this area of north or northwest Alabama for most  
4 of my life.

5 Q Have you ever lived anywhere else?

6 A Yes. I lived in Louisiana for about -- I  
7 think it was 19 months, sometime between 2001 and  
8 2003, when I moved to my current residence.

9 Q Have you ever lived in Charlottesville,  
10 Virginia?

11 A No, sir, I have not.

12 Q Are you currently married?

13 A I am.

14 Q And do you have any children?

15 A Yes, I do. I have three daughters. My  
16 wife and I have three daughters.

17 Q What is the highest level of education  
18 that you've achieved?

19 A I have a Ph.D. degree in history from the  
20 University of Alabama.

21 Q And did you also get a Bachelor's and  
22 Master's from the University of Alabama?

23 A Yes, sir. I got both a Bachelor's and a  
24 Master's from the University of Alabama, yes.

25 Q What is -- what is your field of study,

1 J.M. HILL

2 sir?

3 A In general, it's history. Specifically,  
4 it is British history.

5 Q And was your doctorate in British  
6 history?

7 A Yes, sir, particularly in the area of  
8 Celtic history, Scottish and Irish history.

9 Q When did you receive your Ph.D.?

10 A In the year 1985.

11 Q Where do you work today?

12 A I am retired, sir. I'm not employed.

13 Q When did you retire?

14 A To the best of my recollection, at the  
15 end of 2018.

16 Q From where did you retire?

17 A At that time, I was the paid president of  
18 the League of the South. I still hold that office,  
19 but I do not get paid.

20 Q For how long were you employed by League  
21 of the South?

22 A I was employed from May of 1999 until the  
23 end of December 2018.

24 Q What was your salary with League of the  
25 South?

1 J.M. HILL

2 A When I first started in 1999 -- and this  
3 will just be, sir, from memory, because I don't have  
4 any records in front of us -- I do believe it was  
5 somewhere between 35 and \$40,000 a year, but in 2008,  
6 I reduced that. And from that point until the time I  
7 retired from this position, I was making somewhere  
8 around \$29,000 per year.

9 Q And why did you go from a paid position  
10 at League of the South to an unpaid position at  
11 League of the South?

12 A To be frank about it, sir, to pay my  
13 lawyer. To use the money that would be paid to me to  
14 pay my attorney. So that's the main reason.

15 Q Prior to becoming employed at League of  
16 the South, were you employed anyplace else?

17 A I was. I worked as a -- either a  
18 graduate teaching assistant or a visiting or slash --  
19 or associate -- excuse me. I'm trying to think of  
20 the word. Either a visiting professor or -- I'm  
21 trying to think of the way.

22 But anyway, it was at the university of  
23 Alabama, from 1978 until the end of 1996. And I also  
24 taught at a historically black college, Stillman  
25 College, from 1985 to 19 -- May of 1999. And I

1 J.M. HILL

2 obtained the rank of full professor at that  
3 particular institution.

4 Q So during those years, do I understand  
5 that you held two positions, both at Stillman college  
6 and at the University of Alabama?

7 A Yes, I did. I held -- for part of that  
8 time there was an overlap and I was teaching at both  
9 institutions at the same time.

10 Q Did you author any articles or books  
11 while at Stillman College?

12 A Yes, sir, I did. I've written two books,  
13 one was my Ph.D. dissertation, which was published by  
14 a publisher in Scotland. It's called Celtic Warfare.  
15 And then while I was teaching at both places, I wrote  
16 a biography of a particular Scottish individual in  
17 the 16th century, and that book was published by a  
18 British publisher in 1983. And during that whole  
19 time, I wrote numerous referee -- articles for  
20 referee, historical journals. I can't recall the  
21 names of them right now. There are simply too many.

22 To answer your question, yes, I wrote  
23 both books and articles while I was employed at both  
24 places.

25 Q What was your reason for leaving

1 J.M. HILL

2 Stillman?

3 A I wanted to run the League of the South  
4 full time. I thought at that time it deserved my  
5 full attention. Our board of directors had asked me  
6 if I would leave my job if they raised the money to  
7 pay me a salary, and I told them that if they could  
8 do that, I would be happy to give up my academic  
9 career to run the League of the South full time.

10 By May of 1999, they had raised enough  
11 money to satisfy me that it was worth -- worth the  
12 risk for me to do that.

13 Q What was your salary as a full professor  
14 at Stillman College?

15 A This is -- I can't remember exactly what  
16 it is, sir, but it's -- I seem to recall that my last  
17 year there, my salary was somewhere around 35,  
18 \$36,000 a year.

19 (Hill Deposition Exhibit No. 3 was  
20 marked for the record.)

21 BY MR. LEVINE:

22 Q I am going to show you a document right  
23 now on the screen, which is Exhibit 3, and it's from  
24 the League of the South website. It's from the  
25 League of the South website. It's dated February 4,

1 J.M. HILL

2 2018.

3 Do you see that document, sir?

4 A Yes, I do see that.

5 Q Is that a picture of you on the front?

6 A Yes, I see that.

7 Q And it says -- the opening line is: I'm  
8 a southern nationalist. I am a proud white man. I  
9 suppose that also makes me a white nationalist. So,  
10 in reality, I am a southern, slash, white  
11 nationalist. What does this mean?

12 Are those your words.

13 A Yes, sir, they appear to be.

14 Q And did you write this statement on  
15 southern, slash, white nationalism that was published  
16 on the League of the South website on or about  
17 February 4, 2018?

18 A As best I recall, I did.

19 Q And did that accurately reflect your  
20 views at that time?

21 A Well, I -- I would have to go back and  
22 read this, since it is at least a couple years old.  
23 Can you give me a moment to do that?

24 Q Absolutely.

25 A All right. Okay. Can she move the text



1 J.M. HILL

2 up a little bit where I can -- okay. Thanks. That's  
3 good. Okay. I need it to be moved up a little more,  
4 please. Okay. Is this the end? Is there any more?

5 Okay.

6 Q So my first question, Mr. Hill, is you  
7 wrote that and published it in February 2018, and at  
8 that time that represented your views, correct?

9 A Yes, that represented my -- I did write  
10 this and I presume it is on or sometime around the  
11 4th of February, 2018, and it did represent my views  
12 at the time, yes.

13 Q And did it represent your views in 2017?

14 A I would say that it more than likely did.  
15 I -- I developed these views over a number of years  
16 and I think those two years -- 2017 to 2018, I don't  
17 think my -- my ideas regarding these subjects here  
18 have changed.

19 Q Thank you. And I want to show you  
20 exhibit -- the next exhibit, which we'll mark Exhibit  
21 4.

22 (Hill Deposition Exhibit No. 4 was  
23 marked for the record.)

24 BY MR. LEVINE:

25 Q So Exhibit 4 is another article from the

1 J.M. HILL

2 website of League of the South dated August 18, 2016.

3 Can you see that document?

4 A Yes, I can.

5 Q And is that also a picture of you?

6 A It is, yes.

7 Q A little younger?

8 A Yeah.

9 Q And are those also your own words?

10 A Give me a chance to read this, sir.

11 MR. LEVINE: We've lost you,  
12 Mr. Hill. We've lost you, Mr. Hill, so I  
13 guess we'll -- let's go off the record  
14 but stay live until Mr. Hill reconnects.

15 THE VIDEOGRAPHER: The time is  
16 10:12 a.m. We're off the record.

17 (Brief pause.)

18 THE VIDEOGRAPHER: The time is  
19 10:13. We're on the record.

20 THE WITNESS: Okay. Shift it up a  
21 little bit, please. Thank you.

22 Yes, I remember writing this.

23 BY MR. LEVINE:

24 Q And these were your views at the time,  
25 August 2016?

1 J.M. HILL

2 A They were, yes.

3 Q And this pledge of allegiance continued  
4 to be your beliefs in 2017; is that correct?

5 A Yes, I -- I wrote this in 2016 and I  
6 don't think my views at all had changed on this.

7 I would like to add something to this.  
8 It's a bit tongue in cheek because I have -- there's  
9 --

10 MR. LEVINE: Mr. Hill, I'll ask you  
11 the questions and just answer the  
12 question, and if you want to add anything  
13 at the end of the deposition, Mr. Jones  
14 has the prerogative to do that with you.

15 THE WITNESS: Yes.

16 BY MR. LEVINE:

17 Q So -- so just in summary of these two  
18 documents you consider yourself a southern, slash,  
19 white nationalist, correct?

20 A I do consider myself a southern, slash,  
21 white nationalist, yes.

22 Q And this southern, slash, white  
23 nationalist is defined in these two documents; is  
24 that right?

25 A Not necessarily. I think there's a lot

1 J.M. HILL

2 more to it than that. These are just some of my  
3 thoughts at the time. I think it's much -- the  
4 definition of a white or southern nationalist would  
5 be, obviously, much broader than this.

6 Q But it at least incorporates the thoughts  
7 and ideas that are in these two documents; is that  
8 right?

9 A Well, I couldn't say that for anyone  
10 else. I could say for myself that this is part of  
11 what I believe as a southern nationalist, but I could  
12 not say that this is generically true for any other  
13 person that might consider themselves to be a white  
14 or a white, slash, southern nationalist.

15 Q And in these documents, the -- it refers  
16 to enemies of the people. Enemies of the southern,  
17 slash, white nationalists, include people of color,  
18 correct?

19 A Yes, we have had some people of color who  
20 are stated enemies of who we are and what we believe,  
21 sir.

22 Q And included in your enemies are Jews; is  
23 that correct?

24 A There are some who have proven themselves  
25 to be enemies, by their own words and actions,

1 J.M. HILL

2 against white and southern nationalists, so yes,  
3 that's true.

4 Q But your views been southern, slash,  
5 white nationalism apply to all blacks and all Jews;  
6 isn't that right?

7 A No, it's not. It depends.

8 Q Well, in any document -- in any document  
9 that you've ever written on behalf of League of the  
10 South or southern, slash, white nationalism, have you  
11 ever taken the position that some Jews are good and  
12 only some are enemies of yours?

13 A I have -- I can't recall exactly what I  
14 may have said in other documents on that subject, but  
15 I do know that I have -- I have pointed out on more  
16 than one occasion that organized Jewry and organized  
17 people of color, like the NAACP or Black Lives Matter  
18 or other groups like that, are the ones that I point  
19 to, the ones who are organized and the ones who have  
20 openly and pointedly worked against our own interests  
21 as white and southern nationalists.

22 Q And in any of your -- in any of the  
23 writings in these two documents, do you separate some  
24 Jews from other Jews?

25 A I don't think that I went to the lengths

J.M. HILL

in the two documents here that you've just shown me. Those were two very general, sort of generic documents, but in other speeches and documents that I've given I have differentiated from time to time between those who are open and avowed enemies of white and southern nationalists and those who are in these categories and who are not, who have not proven themselves to be enemies.

Q You understand that League of the South is also a defendant in this lawsuit, correct?

A I do, sir, yes.

Q And you're providing testimony, as president, on behalf of League of the South?

A I understand that, yes.

Q And are you one of the founders of the League of the South?

A I am one of the founders, yes.

Q When was it founded?

A It was founded in June of 1994.

Q And did you become chairman of it at that time?

A I became president of it at that time by a unanimous vote of the people there, and I have continued in that position from that point until

1 J.M. HILL

2 this.

3 Q Do the principles of the League of the  
4 South include the statements in respect of blacks and  
5 Jews that were in your two earlier statements that we  
6 identified as Exhibits 3 and 4?

7 A Repeat that question, sir. I didn't  
8 catch the first part of it.

9 Q And do the principles -- that's  
10 principles, L-E-S -- of the League of the South  
11 include the statements in respect of black and Jews  
12 that were in your two earlier statements posted on  
13 the League of the South website?

14 A Not necessarily. When I -- when we speak  
15 here of the League of the South, we're speaking of an  
16 entity that does not have a mind of its own. It has  
17 members, and not all of those members believe the  
18 same thing.

19 When I speak on the League of the South  
20 website as its president, I'm speaking my own  
21 opinions. These do not necessarily reflect the  
22 opinions or positions of the League of the South in  
23 general on these things. So I am speaking as an  
24 individual.

25 I do represent the League, but I would

1 J.M. HILL

2 not say that all of these views are accepted by every  
3 single league member or maybe not even -- you know --

4 Q Mr. Hill --

5 A All I know is I'm speaking on my own  
6 behalf as the president of the League. So --

7 Q Mr. Hill, I'm not asking you whether all  
8 of the individual members of the League of the South  
9 share all of your views individually.

10 I'm asking you if the League of the  
11 South, as an entity, represents the views in respect  
12 of blacks and Jews that you expressed in the two  
13 statements that you've published on the website. Do  
14 you understand my question?

15 A I do not believe that is true. We have a  
16 list of core principles and beliefs, which I have  
17 submitted as part of my second set of  
18 interrogatories, which lays out what the League's  
19 position is on these issues and others, and as far as  
20 any official statements, those are what we have.

21 As I said, my statements that I might  
22 make on the website, the League of the South website,  
23 or in my speeches don't necessarily reflect the  
24 official views of the League of the South. Those  
25 would have to be approved --



1 J.M. HILL

2 Q Mr. Hill, do -- do blacks belong to the  
3 League of the South?

4 A No. We are a whites-only organization.

5 Q And do Jews belong -- permitted to belong  
6 to the League of the South?

7 A No, sir, and neither are Muslims. We are  
8 a main -- not necessarily, but mainly a Christian  
9 organization and it's made up of whites.

10 Q And the principles of the League of the  
11 South include returning the south to its historical  
12 white character; isn't that right?

13 A That is correct, sir. We believe that  
14 this is our land, it was bequeathed to us by our  
15 ancestors, and we are determined to do what we can to  
16 make it the kind of place that we were left with when  
17 they gave it to us. And what we want to leave for  
18 our children is somewhere where we can have a place  
19 where our people can be prosperous and safe.

20 Q And Mr. Hill -- Mr. Hill, in that -- in  
21 that world that you envision for League of the South,  
22 there would be no Jews living in -- in that  
23 territory, correct?

24 A I am not sure about that, but there would  
25 not be any -- we would not want to see anyone living

J.M. HILL

here who was hostile to the majority of the population. Now, who that might be, I'm not -- I'm not qualified here to say, because that -- that would be a decision that a government that was in charge of this particular place would determine.

Now, we are simply advocates for the right of southern independence, and what happens after that will be up to the people and the government they choose. So --

Q Mr. Hill -- Mr. Hill, in advocating -- in advocating for that southern government, you would advocate for it to be inhospitable to blacks and to Jews; is that right?

A What do you mean, sir, by the term "inhospitable"? Please define that.

Q You wouldn't want Jews and blacks living in the southern nationalist country that you seek -- that you advocate for; isn't that right?

A Not necessarily. It would depend on the attitude, it would depend on the number. We certainly would like to be the majority, because that's what -- that's what we were at the time we had the most peace and prosperity here.

I'm not -- I'm not ready to say that we

1 J.M. HILL

2 would exclude everybody. It would depend on their  
3 role in society, whether they were a positive or  
4 negative influence or whether they were hostile to  
5 the interests of the majority. So I could not say  
6 exclusively, for every single person. So --

7 Q But in all of your writings that you've  
8 published at the League of the South, you've  
9 described enemies of the League and southern and  
10 white nationalists to be blacks and Jews; isn't that  
11 right?

12 A State that -- state that -- make that  
13 statement again. I want to -- I want to make sure  
14 that I understand the --

15 Q In all of the writings that you've  
16 published at the League of the South, on the website  
17 for the League of the South, you've described the  
18 enemies of the League and enemies of southern, slash,  
19 white nationalists to be blacks and Jews; isn't that  
20 right?

21 A No, that's not right. I've written a lot  
22 of things that haven't mentioned our enemies, as you  
23 say, blacks or Jews or anyone else.

24 Q I'm asking you, Mr. Hill, whenever you  
25 have described the League of the South's enemies, you

1 J.M. HILL

2 have described the enemies of the League of the South  
3 and southern, slash, white nationalism to be Jews and  
4 blacks; isn't that right?

5 A I have done that in some of my writings  
6 when I defined the enemies, although I have not  
7 limited it to Jews and blacks. I have noted that  
8 there are many what I call antiwhite-whites who have  
9 positioned themselves to be our opponents, and there  
10 have been Muslims, obviously, who have positioned  
11 themselves to be our opponents.

12 So I'm not just singling out people of  
13 color or Jews.

14 Q But it at least includes Jews and blacks;  
15 isn't that right?

16 A It does include certain --

17 Q Thank you.

18 A -- jews and blacks, and particularly  
19 Jewish and black-run organizations. Not individuals  
20 so much as organizations.

21 Q And the -- the answers to the  
22 interrogatories describe the organization of the  
23 League of the South; is that right?

24 A To the best of my recollection, it does.

25 Q And you're organized by state chapters;

1 J.M. HILL

2 is that right?

3 A We have state chapters, yes. Not in  
4 every state, but in the southern states and a few non  
5 southern states, that is correct.

6 Q How many state chapters do you have in  
7 League of the South?

8 A I would have to go back and count. I  
9 can't give you the number right offhand, but we  
10 have -- I can list the states, if you would like.

11 Q Okay.

12 A All right. Virginia, West Virginia,  
13 North Carolina, South Carolina, Georgia, Florida,  
14 Alabama, Tennessee, Kentucky, Mississippi, Louisiana,  
15 Arkansas, Texas, Oklahoma, and I believe our Missouri  
16 chapter is defunct. Those are the current chapters  
17 that we have.

18 We have had chapters in places as far  
19 flung as New York, Ohio, Michigan and California, but  
20 we just simply don't have enough people in those  
21 states to have viable chapters, so that's pretty much  
22 restricted to the south.

23 (Hill Deposition Exhibit No. 5 was  
24 marked for the record.)

25

1 J.M. HILL

2 BY MR. LEVINE:

3 Q I'm showing you what we're putting up on  
4 the screen as -- I think it will be Exhibit 5, if  
5 you'd take a look at this.

6 A I will.

7 Q This is from your website, dated  
8 February 2, 2017, authored by you; is that correct?

9 A It appears to be, sir. I haven't read  
10 the whole thing, but it appears to be something I  
11 wrote.

12 Q And it announces an entity called the  
13 Southern Defense Force, correct?

14 A Correct.

15 Q And this was -- the Southern Defense  
16 Force was formed as a part of the League of the  
17 South; is that correct?

18 A Yes, it was.

19 Q And is it still in existence?

20 A No, it is not, sir.

21 Q Was it in existence in August of 2017?

22 A To the best of my knowledge, it was in  
23 existence up until somewhere in 2018 and we simply --  
24 we simply quit referring to it by that name. It  
25 is -- I'll answer your questions. I won't add

1 J.M. HILL

2 extra -- go into detail on this.

3 Q Thank you.

4 A Sure.

5 Q And what was your purpose in forming the  
6 Southern Defense Force in or about February 2017?

7 A We had seen, during the Trump  
8 presidential campaign, a lot of violence from groups  
9 like Antifa or Antifa, however you pronounce it, and  
10 Black Lives Matter and other radical, anarchist,  
11 communist type organizations, and we were alarmed.  
12 We, ourselves, had received some threats.

13 And we put this together, mainly as a  
14 security team that would be on-duty during our public  
15 meetings and during our private meetings like our  
16 national conference. So we would have an organized  
17 security force.

18 And I would like to note that this is a  
19 defense organization, not an offense organization.  
20 And we were recruiting people into it, vetting them  
21 and providing them with some fundamental training in  
22 order to make sure that they -- they knew what they  
23 were doing.

24 But as it says at the bottom of this --  
25 I'm looking at it right now -- "We do not advocate

J.M. HILL

the use of violence except in self defense of life, liberty and property," and that was the impulse behind the formation of this, to provide ourselves with security when we went into public.

Because at that time we were doing a good many street demonstrations, flag rallies, literature distributions, and we had state meetings and we had a national meeting every year and we always needed a security group for that and the Southern Defense Force was to be that entity. So that's pretty much the history of it.

Q And so the -- one of the -- as you say in this statement that you just read it includes the principle that the League of the South does not advocate the use of violence except in self defense of life, liberty and property; is that right?

A Yes, that is correct, sir.

Q And when you understood that conduct to be a threat to your life, liberty or property, then the self defense force would be available to engage in violence to defend those rights; is that right?

A Our self defense force would do whatever they were able to do within the law to defend themselves and those for whom they were responsible,



1 J.M. HILL

2 including our property. Obviously --

3 Q And --

4 A Obviously, sir, the idea of defense  
5 sometimes does include, as you know, violence, but  
6 we -- we were not advocating violence, except in the  
7 use of self defense of life, liberty and property.  
8 So --

9 Q And the life, liberty and property in  
10 these words would be as understood by the members of  
11 this League of the South; is that right?

12 A Repeat that, sir. I want to make sure  
13 that I understood what you said.

14 Q The life, liberty and property, as these  
15 words are written, would be as understood by the  
16 members of the League of the South; is that right?

17 A Yes. They would be -- they would be  
18 understood in that context. We would -- we  
19 obviously -- for example, we always contacted the  
20 local --

21 Q You answered the question, Mr. Hill.

22 A Okay. Very good.

23 Q And was the self defense force present  
24 when -- as representing the League of the South in  
25 Charlottesville on August 12th, 2017?

1 J.M. HILL

2 A While they were members of the self  
3 defense force at Charlottesville at that time, the  
4 self defense force was not there, to the best of my  
5 recollection, as a distinct unit. We did have a  
6 number of members there, but I don't recall right  
7 offhand if -- if -- if that was the case or not.  
8 I'll have to -- I'll have to think about that. I  
9 don't know.

10 Q And who was -- did you appoint a leader  
11 in February 2017 of the self defense force?

12 A No, sir, I did not. I did not do that.  
13 I was going to direct this myself, because every  
14 instance that we would have needed some security  
15 people working would be different and we -- really,  
16 by the time that we got this off the ground, I did  
17 not have any idea exactly who I wanted to put in  
18 charge of it or what would be the chain of command  
19 regarding it.

20 So I kept it kind of loose as far as  
21 organization goes, and I basically told -- asked  
22 people -- I said, you know, could you be here at a  
23 certain time to be on the security team for a certain  
24 event. And it was -- it was pretty informal, I  
25 guess, is what I'm saying. So I did not appoint

1 J.M. HILL

2 anybody as a leader.

3 (Hill Deposition Exhibit No. 6 was  
4 marked for the record.)

5 BY MR. LEVINE:

6 Q Thank you. So I want to show you what  
7 I'm going to mark as Exhibit 6. This is another  
8 statement published by you on the League of the South  
9 website on August 13, 2018.

10 A Right.

11 Q Authored by you, correct?

12 A It appears to be, sir.

13 Q And this was a statement on behalf of  
14 League of the South, correct?

15 A Let me read the statement first, please.

16 Q Well, what does the first line say?

17 A The League of the South did not  
18 participate in nor --

19 Q No, no. I'm sorry, sir. The front --  
20 the top line. It says: This is a statement from the  
21 League of the South, correct?

22 A Yes. Yes, that is a statement from the  
23 League of the South representing the league under my  
24 hand, yes.

25 Q So would you please read that document to

1 J.M. HILL

2 yourself.

3 A I will. Okay. I need to have it moved  
4 up a little, please. Okay. I'm finished with it.

5 Yes, I did write that on behalf of the  
6 League of the South.

7 Q And I want to direct you to the paragraph  
8 that starts, Some both on the left and the right.

9 Do you see that?

10 A Yes, I do.

11 Q And this -- this statement was on the  
12 occasion of the first anniversary of the Unite the  
13 Right rally in Charlottesville; is that right?

14 A I believe so. Let me -- I forgot exactly  
15 what the date of this was, but -- August 13th, yeah.  
16 That would have been -- well, almost a year. Almost  
17 a year to the date after -- after the Charlottesville  
18 Unite the Right rally.

19 Q And in this statement that you wrote, you  
20 explain why League of the South was -- did not  
21 participate in Washington, D.C. the day before for  
22 what was called Unite the Right 2.0, correct?

23 A That is correct, yes.

24 Q And in the context of explaining why  
25 League of the South did not participate in Unite the

1 J.M. HILL

2 Right 2.0, you reflected on Unite the Right 1.0; is  
3 that right?

4 A Well, I'm -- I'm trying to see where I  
5 did that.

6 Q Well, look at -- read the paragraph:  
7 Some on both the left and the right speculate that  
8 the alt-right is now dead.

9 A Right, exactly.

10 Q Do you see that sentence?

11 A Yes, I see that.

12 Q And the national front allies that are  
13 referred to in your statement were the TWP and the  
14 NSM and vanguard America, correct?

15 A Those were the nationalists -- those  
16 groups plus the League of the South made up the  
17 Nationalist Front at the time of the Unite the Right  
18 rally in August of 2017.

19 Q And by August -- by August of 2018, you  
20 had withdrawn on behalf of League of the South from  
21 that national front, correct?

22 A To the best of my knowledge, we did that  
23 sometime in the spring or early summer of 2018, to  
24 the best of my recollection.

25 Q And when you say in the next sentence:

J.M. HILL

Quote, Rather we see ourselves as the heart and soul of the hard right, an uncompromising movement of real blood and soil southern white nationalists who will not compromise our vision of a southern homeland for whites.

That was your view in August of 2018, correct?

A Yes, and it was, yes.

Q And it was your view of the League of the South -- it was the League of the South's views as of August of 2017 when they participated with the other national -- Nationalist Front allies in Unite the Right; isn't that right?

A I'm not -- I'm not exactly sure. I mean, this whole idea of our seeing ourselves as the heart and soul of the hard right, I'm not sure that that was our view in August of 2017 as it had become by August of 2018. So things had happened over the course of that year that made us leave the Nationalist Front. So I wouldn't say that was exactly true.

Q You used words real blood and soil southern white nationalists, before August of 2018; isn't that right?

1 J.M. HILL

2 A Well, I -- I -- I don't know --

3 Q Yes or no? Yes or no, Mr. Hill?

4 A All right. Ask that question again, sir.

5 Q You used the words real blood and soil  
6 southern white nationalists to describe League of the  
7 South's views before August of 2018, didn't you?  
8 These are core words -- these are core words?

9 A I'm looking at real blood and soil  
10 southern white nationalists. I don't know if I've  
11 used those exact words before. I think I have used  
12 the term blood and soil before. That's a very --  
13 I've used that quite a bit. And obviously, I refer  
14 to us as southern and white nationalists.

15 I'm not sure I've used that phrase  
16 before.

17 Q And the words blood and soil come from  
18 the Nazi slogan blut und boden, which was a slogan of  
19 the National Socialist Movement in Germany; isn't  
20 that right?

21 A That is what I've heard, but let me tell  
22 you where I first heard --

23 Q Well, I'm asking you -- I'm asking the  
24 questions, Mr. Hill. It will go a lot faster.

25 You know, and you knew when you used

1 J.M. HILL

2 those words to describe the southern nationalist's  
3 view, that those words were words that were used by  
4 the National Socialist Movement in Germany as a Nazi  
5 slogan; isn't that right?

6 A As a historian, I was --

7 Q No, I'm asking you a different question,  
8 Mr. Hill. I want you to answer my question. And if  
9 Mr. Jones wants to ask you where else the historical  
10 derivation of those words are, he's free to do that.

11 I'm asking you, when you used these words  
12 to describe the southern white nationalist views of  
13 League of the South, you have understood that blood  
14 and soil were words in German that were the Nazi  
15 slogan in the '30s; isn't that --

16 A I understood, yes, that those words had  
17 been used, yes.

18 Q Thank you.

19 A Yes.

20 Q And when you say in the last sentence, we  
21 are firm, we, you're referring to League of the  
22 South, correct?

23 A Okay. What -- what sentence now, sir?

24 Q The last sentence of the paragraph  
25 says -- or the last two sentences say: To us, Dixie



1 J.M. HILL

2 is and should be white man's land. We are firm on  
3 the Negro question and the Jew question and we make  
4 no apologies to anyone for what we believe or what we  
5 seek to accomplish for our people.

6 Correct? You wrote that?

7 A Yes, I wrote that.

8 Q And that -- you were the -- the we in  
9 that sentence refers to you on behalf of League of  
10 the South, correct?

11 A I was speaking in my capacity as  
12 president of the League of the South, so, yes, I was  
13 speaking for the League.

14 Q And what is the, quote, Negro question  
15 that you're firm on?

16 A The fact that we have a black opposition  
17 that has manifested itself today in a movement like  
18 Black Lives Matter that is openly hostile to our  
19 positions. That is the Negro question that I'm  
20 referring to.

21 Q And the Jew question?

22 A The Jew question? Very similar. There  
23 are various Jewish organizations, such as the ADL and  
24 the Southern Poverty Law Center, who have proven  
25 themselves very hostile, openly hostile, to our

1 J.M. HILL

2 position.

3 So that when I speak of the Negro  
4 question and the Jew question, I'm talking about the  
5 organized opposition that we've had in the south,  
6 that whites and white southerners, southern  
7 nationalists, have had in the south for many, many  
8 decades from these two particular groups.

9 Q And isn't it a fact that the Negro  
10 question, as far as League of the South is concerned,  
11 is much broader than the Black Lives Matter group?

12 A Yes, it is, because it's a historical  
13 question. It goes all the way back to the civil  
14 rights movement, yes.

15 Q And isn't it a fact -- isn't it a fact  
16 that League of the South has had the views of the,  
17 quote, negro question, closed quote, before Black  
18 Lives Matter was ever an entity on the landscape of  
19 the United States?

20 A Yes, it is. When we first began the  
21 League, we were very much aware of organized  
22 opposition from groups such as the NAACP, which at  
23 the time the League was formed had a very active  
24 campaign of removing southern flags and monuments and  
25 other symbols. So, yes, much before Black Lives

1 J.M. HILL

2 Matter came onto the scene.

3 Q And let me mark the next exhibit, I think  
4 it will be Exhibit 7.

5 (Hill Deposition Exhibit No. 7 was  
6 marked for the record.)

7 BY MR. LEVINE:

8 Q I'm going to play -- I'm going to play a  
9 video for you, sir, and we'll play the video and then  
10 I'll ask you some questions.

11 A Very good.

12 (Video exhibit played.)

13 BY MR. LEVINE:

14 Q So, Mr. Hill, is that you speaking in  
15 that video?

16 A Yes. Let me say this. The video had no  
17 sound to it, and it just sort of went frame by frame.  
18 It was not a continuous flow and there was no sound,  
19 but I do recognize the video and that was me.

20 Q And do you -- was that in Tennessee in  
21 August of 2018?

22 A I know it was in Tennessee. I can't  
23 remember the date right off, sir, but that sounds  
24 about right. I don't remember the exact, date but  
25 yes, it was in Tennessee.

1 J.M. HILL

2 Q And was it -- was it at a meeting of the  
3 state chapter of League of the South?

4 A No, it was not. We had a literature  
5 distribution and a flag rally that weekend in a  
6 local -- local community, and this was at the place  
7 that we were staying after we had finished that  
8 event.

9 Q Have you -- I'm putting up now the  
10 transcript. You can -- you can read it quickly, if  
11 you want to remind yourself of it.

12 A Right, exactly. Yeah, I'll go through  
13 it. I'll go through it here.

14 Well, I did this extemporaneously. I  
15 didn't write anything down, so I'm assuming -- since  
16 I didn't hear the video, I'm assuming these are  
17 similar, at least, to my words. I would say that it  
18 was word for word, but I do remember saying some --  
19 something like this as I was doing this -- this --

20 Q We prepared -- sir, I can represent to  
21 you that we prepared this transcript from the video.

22 A Okay.

23 Q And it's an accurate -- an accurate  
24 representation of what you said.

25 A I would say -- I would say it's a fairly

1 J.M. HILL

2 accurate representation of what I said, yes.

3 Q And could you go back -- did you  
4 recognize any of the individuals standing behind you  
5 in front of the furnace?

6 A Yes, I do.

7 Q Could you please identify them, starting  
8 on the left?

9 A Yeah, put it back on the screen, please.  
10 It's kind of blurred. I'm not sure who that first  
11 person on the left is. I -- I just don't have a good  
12 enough view of the face.

13 The person behind him, the second person  
14 on the left, is Mr. Robert Baker. The person behind  
15 him on the left, I don't know for sure, but that may  
16 be a gentleman named Joel Price. I'm not sure. And,  
17 of course, I'm in the middle holding the flag.

18 The person farthest back on the right is  
19 Reverend Joel Collier. The person standing right in  
20 front of him, their face is obscured by the flag, and  
21 the person standing in front of them, their face is  
22 at least partially obscured about by the flag, so I  
23 don't know who that is and I can't remember from that  
24 long ago. So --

25 Q Okay. Now, this -- this -- who taped you

1 J.M. HILL

2 to during this speech and demonstration?

3 A I don't remember, sir. We had a lot of  
4 people there. I do not remember who taped this. I  
5 had nothing to do with taping it or releasing it.  
6 All I did was to do the ceremony and it was  
7 released -- or actually, I didn't even know it was  
8 going to be released.

9 Q But then you learned it was released,  
10 correct?

11 A Pardon?

12 Q You learned it was released, correct?

13 A Yes, I did learn it was released.

14 Q And how many people were in the audience?

15 A I don't know for sure. My estimation  
16 would be probably two to three dozen.

17 Q And were they members of the League of  
18 the South?

19 A Some were, some weren't.

20 Q And was -- were there people not  
21 connected to the League of the South that were  
22 present?

23 A To the best of my recollection, I think  
24 we may have had maybe half a dozen guests who were  
25 not members of the League at that time. I think

1 J.M. HILL

2 maybe two or three of those subsequently joined, but  
3 I don't remember their names.

4 Q When -- when this -- when you learned  
5 that this was made public on YouTube, did you take  
6 any steps to have it retracted or taken off YouTube?

7 A No, I did not.

8 Q In fact, you liked the fact that it was  
9 on YouTube; isn't that right?

10 A I didn't care one way or the other, sir.

11 Q Well, wasn't it -- in your view, was it  
12 good for the League of the South to let Jews know  
13 what the League of the South and people like you felt  
14 about them?

15 A I have no idea if it would have been good  
16 or not for that.

17 Q I'm asking you personally, sir. When you  
18 learned that it was made public, did you form the  
19 view that that was okay because you wanted Jews who  
20 would see it to know how you felt and what you  
21 believed?

22 A No, that didn't enter my mind.

23 Q So it never entered your mind that this  
24 would be in the public domain and that Jews would see  
25 fellow Americans burning the Israeli flag and the

1 J.M. HILL

2 Talmud?

3 A My consideration in everything that I do  
4 like this is not for what my enemies or my opponents  
5 will think about it. It is what the people that I am  
6 trying to recruit into the League will think about  
7 it. So that would be my main concern about anything  
8 that I put out like this or anything that got put  
9 out. So --

10 Q Actually, it isn't entirely true, is it,  
11 Mr. Hill, that you're only concerned with telling  
12 people what you believe and you don't consider Jews  
13 or blacks understand you to believe?

14 A As I said, sir, my main concern is with  
15 recruitment through these things, and that means  
16 reaching the people who we believe would be good  
17 League of the South members.

18 Q But isn't it true, Mr. Hill, that part of  
19 your message is to communicate to blacks and to Jews  
20 that they are unwanted and unwelcome in your southern  
21 world?

22 A The object of this particular video,  
23 event, was to show that we would take a stand against  
24 the enemies of southern nationalism and the south in  
25 general.



1 J.M. HILL

2 Q And you wanted -- you wanted, Mr. Hill,  
3 the enemies to know that they are your enemies; isn't  
4 that right?

5 A Well, sir, that's your assumption. As I  
6 said --

7 Q I'm asking you the question, sir.

8 A Well, the answer is no. The answer is we  
9 were trying to reach an audience of people that we  
10 thought might become League of the South members. We  
11 had a positive reason for doing this, not a negative  
12 reason.

13 Q So is it your testimony that at no time  
14 has it been the intention of the League of the South  
15 to communicate its views to blacks and Jews for them  
16 to understand that they are unwelcome in the southern  
17 world that you envision?

18 A That's a very, very broad question and --

19 Q And I'm asking you to answer it, sir.  
20 Yes or no?

21 A Can you repeat the question, again, sir,  
22 so I can see if it can be answered with a simple yes  
23 or no.

24 MR. LEVINE: Would the reporter  
25 please read back the question?)

1 J.M. HILL

2 (The last question was read back  
3 into the record.)

4 BY MR. LEVINE:

5 Q I think you can answer that yes or no,  
6 Mr. Hill.

7 A Give me a moment to consider this,  
8 please. It's a very broad question.

9 Yes, we have -- we have made it known  
10 that we would not welcome people who were enemies --  
11 open enemies to us, in our midst, because -- that's  
12 been part of our program from the very beginning, is  
13 to show southern whites that there would be an  
14 organization that would stand for their interests.

15 So yes, we have made it clear that our  
16 enemies are not welcome in our midst as long as they  
17 are our enemies. Now --

18 Q And Mr. Hill -- and Mr. Hill, in burning  
19 the Talmud, you are sending a message it all Jews,  
20 not some Jews; isn't that right?

21 A I don't know. I don't know all Jews,  
22 sir. I know that there are secular Jews and I know  
23 that there are religious Jews, so I don't know  
24 whether that would be correct or not.

25 Q And you also burned the Israeli flag; is

1 J.M. HILL

2 that right?

3 A Yes, absolutely.

4 Q And there are secular Jews in Israel, not  
5 just religious Jews in Israel; isn't that right?

6 A I suppose so, sir. I've never been  
7 there.

8 Q And there are secular Jews in America  
9 that defend Israel; isn't that right?

10 A I would assume so, sir. I don't know  
11 any, so I'm taking your word for it.

12 Q So by burning the Talmud, the book of the  
13 Jews, and the flag of Israel, you are communicating  
14 to all Jews, not some Jews; isn't that right?

15 A I don't know, sir. All I know is I was  
16 exercising my rights of free speech, and if somebody  
17 takes it a certain way, that is their prerogative and  
18 I have nothing to do with it. I'm simply exercising  
19 my right to free speech.

20 There are people who burn American flags  
21 and Bibles all over the place, sir, but I don't  
22 demand that they not be able to do that.

23 Q Going back to Exhibit 6, when you wrote  
24 in August of 2018 -- when you wrote this document in  
25 2018, in August of 2018, this lawsuit had already

1 J.M. HILL

2 been commenced; isn't that right?

3 A Yes, I believe so. I think the  
4 lawsuit -- if I'm not mistaken -- was filed on the  
5 12th of October 2017. So, I guess --

6 Q And you knew what the allegations of this  
7 complaint in this lawsuit were; isn't that right?

8 A Yes, it is.

9 Q And in fact, shortly after the events of  
10 August 12th, 2017, you -- withdrawn.

11 You understood in going to the Unite the  
12 Right in August of 2017 that the League of the South  
13 would need its own narrative for what happened there;  
14 isn't that right?

15 A Okay. Hold on for just a second, sir.  
16 I'm getting a high temperature detected thing on  
17 my -- a warning on my phone here.

18 Please restate the question. I can  
19 listen now.

20 Q You understood in going to Unite the  
21 Right and participating in the Unite the Right rally  
22 in August of 2017 that the League of the south would  
23 need its own narrative for what happened; isn't that  
24 right?

25 A What do you mean, sir, by our own

1 J.M. HILL

2 narrative? Please explain.

3 Q Your own explanation for what you were  
4 doing and what was happening.

5 A We understood -- I'm not sure what you're  
6 getting at. We understood why we were going to the  
7 Unite the Right rally. Of course, we did.

8 Q And you -- and you understood that there  
9 would be media coverage describing what happened and  
10 was happening; isn't that right?

11 A Well, of course we understood that there  
12 would be media coverage of this.

13 Q And you asked -- you asked Brad Griffin,  
14 a member of League of the South at the time, to be a  
15 public relations vehicle, if you will, to create the  
16 narrative for League of the South of what was  
17 happening there; isn't that right?

18 A I'm not sure exactly what I talked to  
19 Mr. Griffin about, other than -- because I have no  
20 record -- record of the conversations that we might  
21 have had face-to-face or by phone, and I'm not -- I'm  
22 not aware of any of the other communications we had  
23 about this, but he did write some --

24 Q Mr. Hill?

25 A He writes a lot of things on his own,

1 J.M. HILL

2 because he has a very popular website.

3 Q Mr. Hill, please.

4 A Yes.

5 Q Listen to my question and answer my  
6 question. Once again, Mr. Jones can ask you all the  
7 questions he wants. I'm trying to ask very specific  
8 questions.

9 Didn't you ask Mr. Griffin to, in effect,  
10 be a public relations vehicle to create a narrative  
11 that would be League of the South's view of what was  
12 happening on the ground in Charlottesville for the  
13 Unite the Right rally?

14 A I don't recall doing that.

15 Q Didn't he do that?

16 A He wrote some things about  
17 Charlottesville after the fact, but I'm -- I don't  
18 think I asked him to do that.

19 Q All right. Well, I'll ask you later  
20 whether -- if documents I show you would refresh your  
21 recollection.

22 A I don't remember -- I don't remember  
23 doing that.

24 Q In any event --

25 A Let me put it that way, I don't remember

1 J.M. HILL

2 it.

3 Q But once Unite the Right happened, you  
4 published your version of the events and explanations  
5 for what League of the South did; isn't that right?

6 A That is correct, yes.

7 Q And one of the things that you were  
8 describing in the August 13, 2018 article was a  
9 disappointment with Mr. Kessler and his leadership of  
10 the Unite the Right rally; isn't that right?

11 A You're frozen. So we'll have to wait  
12 until it's unfrozen.

13 MR. JONES: This might be a good  
14 time to go off the record and take a  
15 quick ten-minute break.

16 I think his phone may be  
17 overheating.

18 MR. LEVINE: Okay.

19 THE VIDEOGRAPHER: The time is  
20 11:11 a.m. We're off the record.

21 (Brief pause.)

22 THE VIDEOGRAPHER: The time is  
23 11:21 a.m. We're on the record.

24 BY MR. LEVINE:

25 Q So, Mr. Hill, you testified earlier this

1 J.M. HILL

2 morning that, sometime in early 2017, League of the  
3 South formed a confederation, if you will, with an  
4 entity that was called the Nationalist Front.

5 And included in that organization were  
6 the Traditional Workers Party, the National Socialist  
7 Movement and Vanguard America; is that right?

8 A That is correct.

9 Q And do I understand from your answers to  
10 the interrogatories that the Nationalist Front was,  
11 in your words, the brain child of Matthew Heimbach,  
12 and it was Matthew Heimbach that asked you to  
13 participate; is that right?

14 MR. LEVINE: You're frozen again.  
15 We seem to have lost Mr. Hill. So let's  
16 just wait.

17 (Brief pause.)

18 THE WITNESS: Sorry about that.  
19 I'm back.

20 THE VIDEOGRAPHER: We can't see  
21 your video, though. Oh, there you are.  
22 Thank you.

23 MR. LEVINE: Mr. Hill?

24 THE WITNESS: Yes.

25 MR. LEVINE: We're back on the



1 J.M. HILL

2 record?

3 THE WITNESS: Yes. Sorry about  
4 that.

5 THE VIDEOGRAPHER: Stand by one  
6 moment. Actually, let me get my camera  
7 going. I'm sorry. We actually are on  
8 the record. I apologize. We are still  
9 on the record.

10 MR. LEVINE: Can we proceed?

11 THE WITNESS: Yes, sir.

12 MR. LEVINE: Oh, I'm sorry. I  
13 thought you said --

14 BY MR. LEVINE:

15 Q Okay. Mr. Hill, there's a question  
16 pending. I asked you: Do I understand from your  
17 answer to the interrogatories that the Nationalist  
18 Front was, in your words, the brain child of Matthew  
19 Heimbach, and that it was Matthew Heimbach that asked  
20 you to participate in that organization; is that  
21 right?

22 A To the best of my recollection, sir, that  
23 is correct.

24 Q And am I correct that all four of the  
25 organizations, namely, the League of the South, the

1 J.M. HILL

2 Traditional Workers Party, the National Socialist  
3 Movement and Vanguard America, marched with the  
4 League of the South on August 12th, 2017 in  
5 Charlottesville?

6 A That is correct.

7 Q And you actually marched that morning on  
8 a public street side by side with Mr. Heimbach; isn't  
9 that right?

10 A That is correct, sir.

11 Q And Mr. Heimbach was head, at the time,  
12 of the Traditionalist -- Traditional Workers Party,  
13 TWP, correct?

14 A As best I know, sir, that is true, yes.

15 Q And the National Socialist Movement, NSM,  
16 at the time was led by Mr. Schoep; is that correct?

17 A I believe -- I don't know if we're  
18 talking about the same person. I always thought his  
19 name was pronounced Schoep, S-C-H-O-E-P.

20 Q Okay, same person.

21 A Yes, same person. To the best of my  
22 knowledge, that is correct, sir.

23 Q And the head of Vanguard America were two  
24 fellows, one by the name of Dillon Hopper and one by  
25 the name of Tom Rousseau?

1 J.M. HILL

2 A I -- I'm not sure, sir. I never met any  
3 one of those in person, to my knowledge, so I -- I'm  
4 not sure.

5 Q Now, in early July of 2017, a month or so  
6 before Charlottesville, Mr. Baker went to a meeting  
7 convened by Mr. Schoep in Tennessee; is that right?

8 A I am not -- I can't recall, sir. I don't  
9 recall the details of that meeting.

10 (Hill Deposition Exhibit No. 8 was  
11 marked for the record.)

12 BY MR. LEVINE:

13 Q Well, I'm showing you what we'll mark as  
14 Exhibit 8, which is an e-mail from you to Mr. Baker  
15 dated July 3, 2017.

16 Do you see it?

17 A Yes. Let me read this. This may jog my  
18 memory about it. Okay. Raise it up a little bit  
19 there where I could finish reading, please.

20 Yes, I do recall that. I just had  
21 forgotten that I had sent that to Mr. Baker and that  
22 he went to that meeting. Yes, I did write that and  
23 sent it to him.

24 Q And you understood that Mr. Baker was  
25 attending, by invitation, a meeting of -- of NSM

1 J.M. HILL

2 coordinate commander, Jeff Schoep, right?

3 A I believe that would be the case, sir.

4 Q And you were sending a message on behalf  
5 of League of the South to -- to NSM, correct?

6 A That is correct, sir.

7 Q And at that time, in July of -- early  
8 July of 2017, the national front alliance had already  
9 been formed, correct?

10 A That is correct.

11 Q And you knew as of July 3rd, 2017 that  
12 each of these organizations would be attending and  
13 participating in the Unite the Right rally together;  
14 isn't that correct?

15 A I think that is correct. I can't speak  
16 for Vanguard America. I know that we had had contact  
17 with the other two, yes.

18 Q And in the fourth paragraph of your  
19 speech, you say: We are compassed around with  
20 enemies who seek our destruction.

21 Do you see -- those are your words,  
22 correct?

23 A Correct.

24 Q And are you using the word compassed to  
25 be another word for surrounded?

1 J.M. HILL

2 A Yes. It's a Biblical term.

3 Q Thank you.

4 Sometime in February 2018, you, on behalf  
5 of League of the South, decided to disassociate from  
6 the Nationalist Front, correct?

7 A I'm not exactly sure when the dates were,  
8 but, yes, it was in the first half of 2018.

9 Q What was your reason for disassociating  
10 from the Nationalist Front at that time?

11 A Our operational security was breached on  
12 several occasions and we believed it was one of those  
13 groups that we were associated with, who had very  
14 loose security.

15 And also, we just decided that it would  
16 be best if we went and did things on our own. We  
17 were not happy with some of our allies. Just let me  
18 put it that way.

19 Q What was the breach, sir?

20 A Pardon? Say that again.

21 Q What was the breach that you just spoke  
22 of?

23 A It was simply our decision that we could  
24 do things better on our own --

25 Q No, you just testified, sir -- you just

1 J.M. HILL

2 testified that there was a breach in the  
3 operations -- the security of the operations. And  
4 I'm asking you: What was the breach?

5 A The breach was that we had an operation  
6 planned -- one plan in north Georgia, another plan in  
7 Bowling Green, Kentucky. And, to our knowledge, NSM,  
8 National Socialist Movement, made an announcement of  
9 one or both of those on a public site and breached  
10 our security and we had to change our plans.

11 And we figured from that point on, that  
12 if this was going to be the standard operating  
13 procedure with them, that we wanted no part of it.

14 Q When did that take place?

15 A I don't recall the exact date, sir.  
16 Sometime in the spring and/or summer of 2018, to the  
17 best of my recollection.

18 Q You withdrew from the alliance in  
19 February of 2018. So, from your testimony, it would  
20 have had to have been before 2018; is that right?

21 A I am -- I am not sure about these dates.  
22 I didn't write all this stuff down at the time  
23 because I didn't think I'd be answering questions  
24 about it. I would have to refresh my memory on  
25 that --

1 J.M. HILL

2 Q But you --

3 A I thought it was sometime in the first  
4 half of 2018 that we made these decisions.

5 Q I'm going to show you -- I'm going to  
6 mark as an exhibit --

7 (Hill Deposition Exhibit No. 9 was  
8 marked for the record.)

9 BY MR. LEVINE:

10 Q I'm showing you Exhibit 9, which is a  
11 statement by you on the League of the South website.

12 A Okay.

13 Q Dated -- dated August 22, 2018.

14 A Okay.

15 Q I may have misspoke. So --

16 A Yeah, I think you did, sir, because --

17 Q It's not 22nd of February. It's August.

18 A Yes, exactly. That makes a lot more  
19 sense, yes.

20 Q So the breaches -- the breaches that you  
21 just testified to committed by the National Socialist  
22 Movement occurred sometime in the first half of 2018,  
23 after UTR?

24 A To the best of my knowledge, that is  
25 correct. Sometime in the first half of 2018.

1 J.M. HILL

2 Q And what was about -- what was it about  
3 the publication of the rallies that NSM made that was  
4 unacceptable to League of the South?

5 A If I understand your question correctly,  
6 it had to do with the simple revelation that the  
7 events were going to take place in the first place.  
8 And secondly, it gave the exact place where we were  
9 going to have our rally and, if I'm not mistaken, the  
10 times that we were going to be there.

11 So it basically laid open to Antifa or  
12 Black Lives Matter, or anyone else, of where we were  
13 going to be and when. And, as I said, I wanted the  
14 ladies and everyone else to be safe. That was it.

15 Q What was your objection to that  
16 happening, sir?

17 A We didn't want trouble. Every time --  
18 this was in 2018. We didn't want Antifa or Black  
19 Lives Matter showing up and causing trouble for us or  
20 the townspeople in the towns where we were.

21 Q Now, during August of 2017 -- during  
22 June, July and August of 2017, you did work with the  
23 organizations in the Nationalist Front to participate  
24 in the Unite the Right rally; isn't that right?

25 A That is correct, yes.



1 J.M. HILL

2 Q And you coordinated certain operational  
3 matters with Mr. Schoep on behalf of the National  
4 Socialist Movement, correct?

5 A That is correct, yes.

6 Q And you coordinated and participated with  
7 Mr. Heimbach on behalf of the Traditional Workers  
8 Party, correct?

9 A That is correct.

10 Q And you understood -- and you had your  
11 own contacts with Mr. Kessler; is that right?

12 A Yes, I was in personal contact with  
13 Mr. Kessler on several occasions.

14 Q And you understood that the Unite the  
15 Right rally was organized, in part, by Mr. Kessler,  
16 correct?

17 A That is correct, sir.

18 Q Now, I want to just digress for a moment  
19 and ask you about Discord.

20 Are you familiar with Discord?

21 A Very, very vaguely.

22 Q What are you -- what do you understand  
23 Discord to be?

24 A Discord was -- was presented to me by  
25 Mr. Baker, Robert Baker, in the spring of 2017 as a

1 J.M. HILL

2 platform that was mainly used by gamers, but it was  
3 good for sharing public routes and things such as  
4 that.

5 And we used it as an organization for a  
6 bit that we held -- or we participated in, in  
7 Pikeville, Kentucky in April of 2017, but I was  
8 never -- I never knew very much about it. I followed  
9 his directives and I never really understood how to  
10 use it.

11 Q Did League of the South have its own  
12 Discord channel?

13 A We had our own Discord channel as far as  
14 I know for the Pikeville, Kentucky event and beyond  
15 that, sir, I am -- I simply have to pray ignorance.  
16 I don't know. It's nothing that I set up.

17 Q But you had a Discord handle, didn't you?

18 A I -- I must have because I got on the --  
19 on the site that Mr. Baker set up for the Pikeville,  
20 Kentucky event. And I think I had to have it to get  
21 on there, but I couldn't tell you what it was or how  
22 to get on there to save my life.

23 Q How -- how did League of the South use  
24 Discord in connection with the Pikeville rally?

25 A Mr. Baker sent me photographs of the

J.M. HILL

roads to get to the place where we were going to be doing our demonstration, and the best way to get in and to get out to avoid Antifa and Black Lives Matter. So it was basically entry and exit from the area we were going to be demonstrating in from aerial photographs, I presume satellite photographs.

Q I want to show you a stipulation, an exhibit -- an exhibit that is a stipulation and order for imaging preservation and production of documents, which is an exhibit in this litigation, and we'll mark that as Exhibit 10.

(Hill Deposition Exhibit No. 10 was marked for the record.)

(Technical discussion.)

BY MR. LEVINE:

Q So, Mr. Hill, please look at Exhibit A, which we've marked now as Exhibit 10.

Is this your handwriting and your signature?

A I don't think so. Yeah, that -- yeah, that's my signature at the bottom, but that's not my handwriting.

Yeah, it -- my handwriting says: To the best of my knowledge and based on the information I

1 J.M. HILL

2 have received from members of League of the South.

3 And then my signature. But the  
4 information above that about all those user names and  
5 all that, that's not my handwriting.

6 Q Do you know whose it is?

7 A No, I have no idea whose it is.

8 Q But were these some of the -- did you  
9 understand when you signed it that these were some of  
10 the platforms used by members of the League of the  
11 South in participating in the Unite the Right rally  
12 in August of 2017?

13 A I recognize some of these. For example,  
14 Ox -- OxDissent, the first one on Twitter, I  
15 recognize that as more than likely having been Brad  
16 Griffin.

17 I have no idea about Lethal Injection on  
18 Facebook. I saw the password and it looked similar.  
19 I know who the Hunter Wallace -- that's the name that  
20 Brad Griffin goes by on-line. And below that is  
21 another OxDissent, and then Prosy (phonetic), I know  
22 that that was connected to Brad as, I think -- I  
23 think an e-mail address.

24 So I assume -- and as I said in my  
25 signature below -- above my signature at the bottom,

J.M. HILL

based on the knowledge that I had of things, they seem to be -- seem to belong to Brad and -- Brad Griffin. They seem to belong to somebody in the League, I guess is what I'm saying.

It's not my handwriting and I don't know these -- none of these are mine. I can tell you that.

Q And -- but during August of 2017, you knew -- or withdrawn.

From June of 2017 through August of 2017, you knew that the Unite the Right organizers and participants were using Discord to communicate with one another about the plans for the event, right?

A Yes, I knew that.

Q And did you have and use a Discord handle to participate in those conversations?

A To the best of my knowledge and the best of my memory, I did not participate in any of those discussions because I did not know how to use Discord and I don't remember even being able to get on there.

Q You provided the Discord information to Mr. Griffin; is that right?

A I don't remember providing any Discord information to anybody, sir, because I'm telling you

1 J.M. HILL

2 I didn't know anything much about it.

3 Q But Mr. Baker and Mr. Griffin were  
4 authorized by you to participate in planning  
5 discussions for Unite the Right; isn't that right?

6 A I asked -- I asked Mr. Baker. I don't  
7 remember asking Mr. Griffin one way or the other, but  
8 I did ask Mr. Baker if he would monitor what was  
9 going on on Discord and simply report to me what he  
10 found.

11 Q And you don't -- and did you also ask  
12 Mr. Tubbs to participate?

13 A No. To my knowledge, I did not ask  
14 Mr. Tubbs.

15 Q But you asked Mr. Tubbs -- you gave  
16 Mr. Tubbs assignments for Unite the Right; isn't that  
17 right?

18 A I don't recall, sir.

19 Q You don't recall giving Michael Tubbs the  
20 assignment of being the commander of operations for  
21 League of the South at Unite the Right?

22 A I misunderstood your question. I thought  
23 you were talking about something on Discord.

24 I did ask Mr. Tubbs if he would, as my  
25 chief of staff, assume responsibility for whatever

1 J.M. HILL

2 operations we did in Charlottesville, yes.

3 Q And do you know, as you sit here today,  
4 how Mr. Baker or Mr. Griffin or Mr. Tubbs got the  
5 information to participate in Discord?

6 A Repeat that, please. I didn't hear the  
7 first part of what you said.

8 Q Do you know -- do you know how Mr. Tubbs,  
9 Mr. Griffin or Mr. Baker got the information about  
10 Discord in order to participate in the communications  
11 on it?

12 A No, sir, I don't. I do recall knowing  
13 anything about Discord until I was simply -- I was  
14 told by someone -- it may have been Mr. Kessler --  
15 that there was a Discord channel and at that point I  
16 don't remember whom I asked about getting on Discord  
17 or anything else. I didn't write any of this down.  
18 I didn't know I would have to remember it.

19 Q But you knew that Discord was, if you  
20 will, a private communications channel that the  
21 participants could use to organize the event; isn't  
22 that right?

23 A Yes, that is right. Mr. Kessler told me  
24 that they were setting up a Discord channel, yes.

25 Q Let me show you the next exhibit, which

1 J.M. HILL

2 is Exhibit 11.

3 (Hill Deposition Exhibit No. 11 was  
4 marked for the record.)

5 BY MR. LEVINE:

6 Q Can you take a look at this document,  
7 which discloses your cell phone number, various  
8 e-mail addresses and social media information.

9 Do you see that?

10 A What am I supposed to be looking for,  
11 sir?

12 Q The telephone numbers that are disclosed  
13 for you?

14 A Yes, I see them.

15 Q And did you supplement this disclosure  
16 with what you provided a few weeks ago, in March of  
17 2020?

18 A I'm not quite sure what you mean by that.  
19 Did I supplement the information that's before me  
20 with further information?

21 Q Yes.

22 A I don't recall. Those are the only two  
23 phone numbers that I have. One is my office -- the  
24 3580 is my cell number and the land line is the other  
25 one. But those are the other two numbers of mine



1 J.M. HILL

2 that I recognize.

3 Q So during this time, did you have -- you  
4 had a cell phone, correct?

5 A Yes, I did. And it was the same number  
6 as you have on the screen here.

7 Q And did you have a laptop?

8 A No, I don't have a laptop.

9 Q Did you ever have a laptop?

10 A I have access to a laptop. It's someone  
11 else's personal laptop. It's not mine. I don't have  
12 one.

13 Q Do you have a regular computer?

14 A Yes, I have a desk top.

15 Q And whose laptop have you used?

16 A I haven't used it for League business. I  
17 use my wife's laptop for personal business and things  
18 like that, but not for League business.

19 Q Did you use the desk top for League  
20 business?

21 A Yes, I did.

22 Q Did you provide the desk top to Mr. Jones  
23 to be imaged?

24 A I did.

25 Q In this case?

1 J.M. HILL

2 A Yes, I did.

3 Q And did you have any other cell phones  
4 besides the cell phone that you see here?

5 A No, sir.

6 Q Did you provide that -- have you changed  
7 cell phones since 2017?

8 A No, sir.

9 Q Did you provide the cell phone to  
10 Mr. Jones for imaging in this case?

11 A I did.

12 (Hill Deposition Exhibit No. 12 was  
13 marked for the record.)

14 BY MR. LEVINE:

15 Q Let's look at -- let's look at -- I'm  
16 showing you what's been marked as Exhibit 13 -- or  
17 Exhibit 12, which is an e-mail from you to Mr. Tubbs  
18 in September of 2018.

19 Do you see that?

20 A Yes, I see that.

21 Q And that is an e-mail address for you,  
22 lspres@protonmail.com, correct?

23 A That's correct, yes.

24 Q And the e-mail address for Mr. Tubbs is  
25 had lscoc@protonmail.com, correct?

1 J.M. HILL

2 A That's correct, yes.

3 Q And is lspres the name that you use for  
4 the ProtonMail account?

5 A Yes, that's my ProtonMail e-mail address.

6 Q And that stands for League South  
7 president?

8 A League of the South president, exactly.

9 Q And what does Mr. Tubbs' e-mail address  
10 stand for?

11 A Well, it should be -- it should be COS.  
12 That's a mistake. I think he subsequently changed  
13 it. That should be LSCOS, instead of COC.

14 Q What does it stand for, sir?

15 A I don't know what COC stands for. You  
16 would have to ask Mr. Tubbs. Mine stands for LSPRES,  
17 president.

18 Q And when did -- did the League of the  
19 South register e-mail accounts with ProtonMail as the  
20 server in 2018 or before 2018?

21 A Sir, I can't -- I can't remember when we  
22 did that.

23 Q Why did -- where is the ProtonMail server  
24 located? Where is that business located?

25 A I always understood it was in

1 J.M. HILL

2 Switzerland.

3 Q And what was the reason that League of  
4 the South decided to use a Swiss server business  
5 instead of a more familiar one like Gmail or Yahoo?

6 A Because of security reasons.

7 Q And I'm showing you -- what do you mean  
8 by security reasons?

9 A We found it would be more difficult for  
10 people to -- I guess -- and I'm -- to hack into our  
11 e-mails or to -- to discover our private  
12 conversations.

13 Q You wanted to maintain the secrecy of the  
14 League of the South communications to the fullest  
15 extent possible; is that right?

16 A We wanted to make sure our privacy was  
17 secure.

18 Q Are you -- are you familiar with any  
19 other e-mail addresses on ProtonMail of any other  
20 members of League of the South?

21 A Not right offhand. I don't -- no, I'm  
22 not.

23 Q How did you disseminate to League of the  
24 South members the fact that you were using  
25 ProtonMail?

1 J.M. HILL

2 A I don't remember. I don't remember how  
3 we did that. I'm sure it was one of two ways.

4 MR. LEVINE: Okay. I'm going to  
5 take a break for lunch right now. If  
6 it's okay with Mr. Jones and the reporter  
7 and Mr. Hill, I'd like to reconvene at  
8 12:30, only 30 minutes. Is that  
9 acceptable?

10 THE WITNESS: It's fine with me.

11 MR. JONES: That's fine with me.  
12 This is Bryan Jones.

13 MR. LEVINE: Thank you, Bryan.  
14 Reporter, is that okay?

15 THE COURT REPORTER: Yes.

16 MR. LEVINE: Okay. Let's go off  
17 the record at noon.

18 THE VIDEOGRAPHER: The time is  
19 12:01 p.m. We're off the record.

20 (Brief pause.)

21 THE VIDEOGRAPHER: The time is  
22 12:33 p.m. We're on the record.

23 THE COURT REPORTER: This is the  
24 court reporter. Can I, please, have  
25 everyone who is on the conference call

1 J.M. HILL

2 identify themselves, along with their  
3 phone number, please.

4 MR. CAMPBELL: Sure. This is Dave  
5 Campbell on behalf of Defendant Fields.  
6 I'm not sure of my exact outgoing number,  
7 but the number is some derivative of  
8 (804)644-7400.

9 MR. KOLENICH: This is Jim  
10 Kolenich, and my number is (513)324-0905.  
11 I'm also logged in on a desktop under the  
12 name Jim.

13 MR. JONES: This is Bryan Jones.  
14 Jeremy Lawdonsock (phonetic) is -- works  
15 for me in my office. He's on the line,  
16 too. He has another line. He's on his  
17 computer, not on a real phone.

18 MR. LEVINE: Who is Mr. Lawdonsock?

19 MR. JONES: Sorry. What was that?

20 MR. LEVINE: Who is Mr. Lawdonsock?

21 MR. JONES: He works for me. He  
22 works for my office. This is Bryan  
23 Jones.

24 MR. LEVINE: Okay. And who is KB?  
25 There's somebody identified as KB

1 J.M. HILL

2 participating. And who is Simi, S-i-m-i?

3 MR. CAMPBELL: One of the experts

4 on the case, and so is KB.

5 MR. LEVINE: Okay. Thank you.

6 BY MR. LEVINE:

7 Q Mr. Hill, let's proceed. I'll remind you  
8 you're under oath. Okay.

9 We're going to show you an exhibit, which  
10 is an e-mail on your behalf, League of the South,  
11 dated May 17, 2017.

12 Do you see it?

13 A Yes, I see it.

14 Q I'm marking this as Exhibit 13.

15 (Hill Deposition Exhibit No. 13 was  
16 marked for the record.)

17 BY MR. LEVINE:

18 Q Mr. Hill, what was the e-mail address  
19 lsstaff@yahoogroups.com?

20 A That was an old group -- I don't even  
21 know what to call it -- I guess e-mail list that we  
22 used at one time. I think it's still extant, but we  
23 hardly ever use it.

24 I used it for this because I knew there  
25 were a few people on there I couldn't get in contact

1 J.M. HILL

2 with otherwise, but it's just pretty much obsolete.

3 Q But you were using it in May of '17?

4 A Yes, I know. I said there were two or  
5 three people on there that I thought I could reach  
6 that I couldn't reach otherwise. So --

7 Q And what is the -- and how many people  
8 were on the group -- in the group contact of LSSTAFF?

9 A At one time, that was our main way of  
10 e-mail communication with our officers, but over --  
11 over time it kind of fell by the wayside. I don't  
12 know. I don't know the exact number.

13 Q But it was officers in each of the state  
14 chapters?

15 A I do believe that was the way it was set  
16 up, yes.

17 Q So who organized that contact  
18 identification, that group? Was that something you  
19 did?

20 A No. That was something a previous member  
21 who was our -- sort of our unofficial communications  
22 man, did for us years and years and ago. He's long  
23 gone.

24 Q Who was that? Spell it. What's his  
25 name?



1 J.M. HILL

2 A Pardon?

3 Q What is his name?

4 A Michael Crane, C-R-A-N-E.

5 Q And what does LSBOD stand for?

6 A LS board of directors. The staff was for  
7 officers below the board level, and BOD meant LS  
8 board of directors. So --

9 Q Was this e-mail sent by you or on your  
10 direction?

11 A I think actually I sent it and included  
12 LSSTAFF and LSBOD among the recipients of this.  
13 So -- that was at a time when I was still -- still  
14 using that to some degree, because as I said, there  
15 were a few people on there I didn't know I could  
16 reach any other way.

17 Q And this document says, among other  
18 words, I'm reading only part of it: This is an  
19 official call for resistance. I have spoken with  
20 many of you at length face to face about the nature  
21 of such resistance.

22 A Yes.

23 Q The Facebook and all other internet  
24 platforms are either controlled by the enemy or  
25 monitored by the authorities that care not what

1 J.M. HILL

2 happens to us and our civilization. Therefore, I  
3 want no discussion here or elsewhere on-line of any  
4 resistance strategies, tactics, logistics, plans,  
5 operations or after-action reports. Those will --  
6 those all will be handled through secure channels,  
7 period.

8 What was the -- what was the  
9 resistance -- what was the object of the resistance,  
10 Mr. Hill?

11 A It's been over three years ago. I don't  
12 recall.

13 Q So, essentially, were you instructing  
14 people on the League of the South board of directors  
15 and staff not to use Facebook and other internet  
16 platforms that could be monitored? Yes?

17 A Yes, yes. I was -- yes, the answer is.

18 Q And what -- what secure channels were you  
19 relying on starting in May of 2017 to communicate?

20 A Mainly telephone calls and face-to-face  
21 communication.

22 Q Well, you were also using ProtonMail,  
23 correct?

24 A I can't remember when I started using  
25 ProtonMail.

1 J.M. HILL

2 Q You were using -- some were using  
3 Discord, correct?

4 A Let's see. May? We had -- in April, I  
5 believe it was, of 2017 we had a Discord channel that  
6 was set up for our Pikeville, Kentucky event, but  
7 that was strictly for logistics for that operation.  
8 Otherwise, I was communicating sensitive information  
9 by phone and face-to-face.

10 Q What about the server called DK?

11 A Sir, I -- yeah, I can barely hear you.

12 Q What about the server called VK? Are you  
13 familiar with that?

14 A Yes, I am. I have a personal VK account.

15 Q And what is VK?

16 A It is, to my understanding, the Russian  
17 equivalent of Facebook.

18 Q And when did you start using VK?

19 A I can't remember.

20 Q At least as far back as 2017?

21 A I can't remember. I'll have to go back  
22 and look at things to see when I -- when I started  
23 and when I started posting. I can't remember right  
24 offhand.

25 Q Could you please do that and when you --

1 J.M. HILL

2 you will receive a copy of this transcript after the  
3 deposition is concluded.

4 A Right.

5 Q And I'm going to ask the reporter to  
6 leave a space for you to enter the date after you  
7 check on when you started to use VK.

8 A That will be fine.

9 ANSWER:\_\_\_\_\_

10 \_\_\_\_\_.

11 BY MR. LEVINE:

12 Q And then you'll look and see whether the  
13 answers to the interrogatories need to be  
14 supplemented with VK, with additional information.  
15 Okay?

16 Did you make an effort, in discussing  
17 tactics and strategies with members of the League of  
18 the South in connection with Charlottesville, to keep  
19 your communications over the phone and face-to-face  
20 which could not be hacked or identified or located by  
21 the authorities?

22 A No, we made no specific attempt to do  
23 that.

24 Q But you used your traditional forms of  
25 communication pursuant to this directive, correct?

1 J.M. HILL

2 A We used Facebook, Twitter and, at the  
3 time, I'm not sure that we were on VK yet. VK -- I  
4 know that VK was the substitute, for me, for Facebook  
5 when I got kicked off after Charlottesville.

6 I would say we used the normal social  
7 media links of Facebook and Twitter, and we used  
8 phone calls, we used e-mails and we used face-to-face  
9 communications, for all sorts of information.

10 Q I'm going to show you an exhibit which we  
11 will mark as Exhibit 14.

12 (Hill Deposition Exhibit No. 14 was  
13 marked for the record.)

14 BY MR. LEVINE:

15 Q This is from the website of League of the  
16 South dated August 23, 2017.

17 This is written by you on behalf of  
18 League of the South; is that right?

19 A That is correct.

20 Q And in the beginning of this -- do you  
21 want to read this -- read the beginning of it. I'll  
22 ask you a question or two.

23 A You said at the beginning, do you mean  
24 the first paragraph?

25 Q First two paragraphs.

1 J.M. HILL

2 A First two. Okay. I'll read it.

3 Okay. I'm finished with the first two  
4 paragraphs.

5 Q And from whom did you receive the  
6 invitation to speak at this event?

7 A From Jason Kessler.

8 Q Was that an invitation conveyed in a  
9 conversation or an e-mail?

10 A I don't recall, but I think it was made  
11 in a phone call. I don't know -- I can't remember  
12 for sure, but I think it was a phone call.

13 Q And I take it he called you?

14 A I can't remember.

15 Q Was there an intermediary between you and  
16 Mr. Kessler?

17 A No, I don't believe there was.

18 Q So had you ever met Mr. Kessler before  
19 you talked to him on the phone in the spring of 2017?

20 A No, I had not.

21 Q So you wouldn't be calling him, then; is  
22 that right?

23 A I wouldn't say that I wouldn't be calling  
24 him. I just right now don't remember if he called me  
25 or I called him.

1 J.M. HILL

2 Q But if you called him, how did you get  
3 his name and number? Who's the intermediary, sir?

4 A I don't -- I don't recall having an  
5 intermediary. And I'm not saying he didn't call me.  
6 I'm just saying I don't remember.

7 Q And what did Mr. Kessler say to you in  
8 that first conversation?

9 A To the best of my knowledge, sir, he  
10 asked me if I would agree to speak at the Unite -- he  
11 explained the Unite the Right rally to me, what it  
12 was all about, the reason for having it. He asked me  
13 if I would speak and if I would ask the League of the  
14 South members to come in support of the rally.

15 And I agreed to speak and to ask our  
16 people to attend.

17 Q What did he tell you was the purpose of  
18 the rally?

19 A The purpose of the rally was to defend  
20 the statue of Robert E. Lee, and that was then known  
21 as Lee Park in Charlottesville, because of threats by  
22 the City of Charlottesville to take the statue down.

23 Q Have you heard of the rally in May in  
24 Charlottesville regarding the same statue?

25 A I remember speaking of a rally that was

1 J.M. HILL

2 organized, I believe, by Richard Spencer. Yes, I was  
3 aware of it. I heard something about it on social  
4 media.

5 Q Did you attend that rally in May of 2017?

6 A I did not.

7 Q Do you know of any League of the South  
8 members that attended that rally in May of 2017?

9 A I don't recall any right now.

10 Q So what did Mr. Kessler tell you was the  
11 purpose of the rally in July of -- the purpose of the  
12 rally coming up in August of 2017?

13 A He told me it was to rally support for  
14 the statue of Robert E. Lee, at Lee Park, which was  
15 being threatened to be taken down by the authorities  
16 in the City of Charlottesville.

17 Q You have, in the first paragraph of  
18 Exhibit 14, the sentence: The League of the South  
19 went to Charlottesville for two main reasons: To  
20 spread our nearly quarter century old message of  
21 southern nationalism and independence, and to stand  
22 with our allies on the right in defense of the memory  
23 of hard-line heroes.

24 A That is correct.

25 Q What did Mr. Kessler say, if anything,



1 J.M. HILL

2 about the first part of that sentence, namely,  
3 spreading the nearly quarter century old message of  
4 southern nationalism?

5 A To the best of my knowledge, he didn't  
6 say anything about that. That was our goal, was to  
7 use our presence there to spread our message.

8 Q Did you understand from Mr. Kessler  
9 who -- whether you were going to be the only speaker  
10 or whether there would be other speakers?

11 A Sir, you're breaking up. I can't hear  
12 you. Could you please repeat that.

13 Q Did you understand from Mr. Kessler that  
14 you were going to be the only speaker at this event  
15 or that there would be other speakers?

16 A He said there would be other speakers.

17 Q Did he tell who any of those other  
18 speakers were?

19 A At the time, I don't recall if he told me  
20 about that or not in our initial phone call. I just  
21 heard he was trying to gather a group of speakers and  
22 he asked me if I would be part of it.

23 (Technical discussion.)

24 THE VIDEOGRAPHER: Would you like  
25 to call back in. The number is

1 J.M. HILL

2 646-558-8656. I'll start again.

3 646-558-8656.

4 (Technical discussion.)

5 BY MR. LEVINE:

6 Q So, Mr. Hill, I was in the middle of  
7 asking you a question, Mr. Hill.

8 Did you understand from Mr. Kessler who  
9 the other speakers would be?

10 A As best I recall, in our first  
11 conversations I didn't ask him who any of the  
12 speakers were going to be and he didn't tell me.  
13 Now, subsequently, I did learn who some of them were.

14 Q And who did you learn -- who were the  
15 first few speakers that you learned would be joining  
16 you on the platform?

17 A Well, one was Mr. Kessler himself. And,  
18 you know, I -- I'd have to go back and kind of look  
19 at the -- at the brochure that they did on this to  
20 see. I mean, the event never took place, so I have  
21 no memory, you know, of who spoke.

22 And by the way, I'm getting a bad echo on  
23 here. It's hard to talk.

24 Q Mr. Hill, did you understand, in the  
25 initial conversation or the early conversations with

1 J.M. HILL

2 Mr. Kessler, that the speakers would generally be  
3 supportive of the message of southern nationalism  
4 that League of the South stood for?

5 A No.

6 Q Did you understand that your allies from  
7 the Nationalist Front would be invited and cooperate  
8 and join this event?

9 A At that time, no.

10 Q When did you learn that?

11 A I don't recall. It was sometime in the  
12 summer of 2017, but I don't recall exactly.

13 Q So sometime -- is it fair to say, then,  
14 that sometime before July of 2017 you understood that  
15 the other speakers and participants that would be  
16 participating would all share the common message of  
17 the southern nationalist message of League of the  
18 South?

19 A No. No. I never anticipated that they  
20 would. We were there as a distinct organization,  
21 with a distinct message, and I didn't expect anybody  
22 else to support that message necessarily.

23 Q Well, you understood that your allies in  
24 the Nationalist Front were also invited, correct?

25 A Later on -- later on that summer, I found

J.M. HILL

out that Traditionalist Workers Party, NSM and others were considering going, and in some cases had been asked to go.

Q And did you learn that there were discussions with -- withdrawn.

So before the plans got finalized, you understood that those organizations would be joining the rally, correct?

A I can't remember exactly when I learned that TWP and NSM were going to be there, but I think it's fair to say that, by July, that that would have been the case.

Q And is it fair to say that you shared common goals with NSM and with TWP?

A If we did, they would have been just very general goals. As I said, we're a distinct, stand-alone organization. We were, to my knowledge, the only southern nationalist organization there.

Q But other than the focus on the southern heritage, is it fair to say that you shared common goals with NSM and TWP?

A Could you please define what you mean by goals here?

Q Did you share a common purpose?

1 J.M. HILL

2 A I'm not sure I can answer that. I --

3 Q Well, you formed -- Mr. Hill, I'm not  
4 trying to make this difficult.

5 You formed an alliance called the  
6 Nationalist Front in the spring of 2017 with those  
7 two organizations; isn't that right?

8 A That is correct.

9 Q So then you tell me, when you formed that  
10 alliance in the spring of 2017, what did you  
11 understand you had in common with them that gave you  
12 comfort that you should be an alliance with them?

13 A The fact that they were very pro-white  
14 and nationalist in their outlook, and also we  
15 believed that we needed an alliance where our numbers  
16 would be suitable to go to some of these places  
17 because of the danger level involved.

18 We had seen what Antifa and Black Lives  
19 Matter had done on the West Coast, in particular, and  
20 we thought it would be for security, increase our  
21 security.

22 Q So, Mr. Hill, you understood when you  
23 formed the alliance, the Nationalist Front, that TWP,  
24 NSM and Vanguard America shared white nationalist  
25 objectives that League of the South did; isn't that

1 J.M. HILL

2 right?

3 A I'm not sure about the objectives. I  
4 think their pro-white stances were --

5 I'm having a hard time with this echo,  
6 sir, I really am. Is there some way that we can get  
7 this cleared up, because it's really having -- I'm  
8 having a hard time concentrating on my answers.

9 MR. LEVINE: Well, I don't know  
10 what to tell you, Mr. Hill. You can try  
11 back on your cell phone.

12 THE WITNESS: Is there a what now?

13 MR. LEVINE: Do you want to try  
14 back on your cell phone?

15 THE WITNESS: Yes, let me try that  
16 again and see how it works. Hang on.

17 (Brief pause.)

18 MR. LEVINE: Are we ready,  
19 Mr. Hill?

20 THE WITNESS: Okay. Yes, I'm  
21 ready.

22 BY MR. LEVINE:

23 Q So I asked you: Since you formed an  
24 alliance on behalf of League of the South with TWP  
25 and NSM and Vanguard America in the spring of 2017,

1 J.M. HILL

2 what was -- what was the reason for forming that  
3 alliance?

4 A The -- the alliance -- the alliance's  
5 first operation was in Pikeville, Kentucky, and we  
6 decided at that point that it would be good to work  
7 with these groups because of the numbers involved.

8 We were aware of things, and we thought  
9 the more people we had, the more secure we would be.  
10 And, as I said, these groups shared white nationalist  
11 sympathies -- not necessarily the same goals or  
12 programs, but sympathies -- with the League, and we  
13 thought that it would be a good thing to have a sort  
14 of informal -- to create an alliance at some of these  
15 events that we were going to be participating in  
16 throughout the summer of 2017.

17 Q And when Mr. Kessler -- when your  
18 discussions with Mr. Kessler proceeded in the -- into  
19 the summer of 2017, did you understand that all of  
20 the organizations to be invited to Unite the Right in  
21 Charlottesville would share the same white  
22 nationalist sympathies?

23 A I don't think that -- I don't think that  
24 we actually discussed that, but I think it was  
25 implicit that all of us shared some common ideas and

1 J.M. HILL

2 principles.

3 Q And when you wrote in August of 2017,  
4 quote, We also encouraged our members to attend what  
5 was shaping up to be a large gathering of right wing  
6 groups in a show of solidarity in defense of our  
7 southern inheritance, you understood that all of  
8 those participating organizations and speakers shared  
9 your common view of white nationalism, correct?

10 A Yes, I understood that they shared our  
11 common view of white nationalism, and they were there  
12 specifically to help us with some of these events.  
13 As I started to say, it had been our intention here.

14 Q And so the Unite the Right rally wasn't  
15 only about protesting the General Lee statue. It was  
16 intended to promote the white nationalist views of  
17 the right wing groups that would be participating;  
18 isn't that right?

19 A I can't speak for the other groups except  
20 for League of the South. I don't know whether the  
21 NSM or TWP -- I do not know that they would be  
22 there --

23 (Technical discussion.)

24 MR. LEVINE: Mr. Hill --

25 Madam Court Reporter, why don't you



1 J.M. HILL

2 read what you have, and see if Mr. Hill  
3 wants to add anything.

4 (The answer was read into the  
5 record.)

6 THE WITNESS: What I meant to  
7 convey is that I don't know why TWP or  
8 NSM was there or what they wanted to  
9 accomplish --

10 THE COURT REPORTER: Again, you're  
11 breaking up. You're breaking up. I'm  
12 not getting any of that. I don't know if  
13 you're too close to the phone or what.

14 Lem, are you getting the same  
15 distraction I am, or do you hear him?

16 THE VIDEOGRAPHER: Yes, I am  
17 getting exactly the same thing. It's  
18 breaking up and distorted.

19 THE COURT REPORTER: Yeah.

20 MR. JONES: Let's go off the record  
21 here and see if we can figure out what's  
22 going on.

23 THE VIDEOGRAPHER: The time is  
24 1:14 p.m.

25 (Technical discussion.)

1 J.M. HILL

2 THE VIDEOGRAPHER: The time is 1:17  
3 p.m. We're on the record.

4 BY MR. LEVINE:

5 Q So, Mr. Hill, let me ask the question  
6 again and see whether we can get your answer. Can  
7 you hear me, Mr. Hill?

8 So let me ask the question again and  
9 maybe try to answer it as succinctly as you can.

10 And so the Unite the Right rally wasn't  
11 only about protesting the General Lee statue. It was  
12 intended to promote the white nationalist views of  
13 the right wing groups that would be participating;  
14 isn't that right?

15 A Like I said, I can't speak for what --

16 Q I'm only asking you -- sir, I'm only  
17 asking you to speak on behalf of League of the South  
18 and your understanding on -- as to the basis for the  
19 rally? Mr. Hill?

20 (Technical discussion.)

21 BY MR. LEVINE:

22 Q Okay. Mr. Hill?

23 A Yes. Yes, I can hear you.

24 Q So let me ask the question a third time.  
25 Let's see if you can answer it succinctly.

1 J.M. HILL

2 And so am I correct that the Unite the  
3 Right rally, as you understood it in its planning  
4 stage, wasn't only about protesting the General Lee  
5 statue in Charlottesville; it was intended to promote  
6 the white nationalist views of the right wing groups  
7 that would be participating, correct?

8 A No, I never understood it to be that way.

9 THE VIDEOGRAPHER: Sir, I can't see  
10 you on the video.

11 THE WITNESS: Well, that -- if I  
12 get too close to the phone, it starts  
13 interfering with the audio. So what I  
14 need to get --

15 BY MR. LEVINE:

16 Q Didn't you say on August 23rd that there  
17 were two reasons for League of the South  
18 participating, one of which was to spread your  
19 message of southern nationalism?

20 A Yes, I did, and that was -- that was  
21 always our goal.

22 Q And didn't you also say on August 23rd  
23 that you encouraged members to attend what was  
24 shaping up to be a large gathering of right wing  
25 groups in a show of southern solidarity in defense of

1 J.M. HILL

2 our southern inheritance?

3 A Yes, I did say that, and that's exactly  
4 why the League went.

5 Q So if you said both of them, that's --  
6 those are the reasons why you encouraged people to  
7 attend from League of the South, right?

8 A Yes, of course.

9 Q And did you learn, ever, that people that  
10 would be invited and speaking wouldn't share those  
11 two essential facts?

12 A I didn't expect them to do anything that  
13 would generally promote the League of the South, but  
14 I did expect them to come to Virginia to help us  
15 defend our southern cultural heritage. So, yes on  
16 one, and no on the other.

17 Q But the southern cultural heritage was a  
18 white nationalist southern cultural heritage,  
19 correct?

20 A Not necessarily.

21 Q Well, did you ever learn that any of the  
22 people that were invited to speak didn't share that  
23 white nationalist philosophy?

24 A No, I didn't, and I didn't have a chance  
25 to learn it there because they were not allowed to

1 J.M. HILL

2 speak.

3 Q But you saw all of the -- you saw banners  
4 and -- banners of participating speakers; isn't that  
5 right?

6 A I don't know if any of those banners  
7 represented any particular speaker. As I said, I  
8 can't remember exactly everybody on the agenda at  
9 this point. I'd have to refresh my memory. But I  
10 don't know what those gentlemen were going to say.

11 Q But did you ever -- would you have gone  
12 and asked the League of the South members to go if  
13 you didn't understand that the participants and the  
14 speakers were going to share your white nationalist  
15 philosophy?

16 A I would not have gone had I thought that  
17 they would have been in opposition to it.

18 Q Thank you.

19 A I don't have to always be somewhere where  
20 everybody agrees with me, and this was one of the  
21 cases where that would have been -- been true, you  
22 know. So --

23 Q You didn't understand that people from  
24 Black Lives Matter were being given an opportunity to  
25 speak at the rally, right?

1 J.M. HILL

2 A If -- if we had had Black Lives Matter or  
3 Antifa people speaking at the rally, I wouldn't have  
4 been there to speak.

5 Q Thank you. Okay. And the people that  
6 you were working -- withdrawn.

7 You worked with Mr. Kessler in organizing  
8 League of the South's role, correct?

9 A We discussed it. Basically, we decided  
10 to provide for our own security when we saw that  
11 Mr. Kessler's plan didn't provide for a lot of  
12 security, in our opinion. So --

13 Q Putting security aside, Mr. Hill, you  
14 talked to Mr. Kessler about organizing the event;  
15 isn't that right?

16 A Yes, that is -- that is correct.

17 Q And you talked to Mr. Schoep about  
18 organizing the event, correct?

19 A That is correct.

20 Q And you talked to Mr. Heimbach about  
21 organizing the event, correct?

22 A Yes.

23 Q And you understood all of them to be  
24 sharing a common white nationalist view as to the  
25 purpose of the rally; isn't that right?

1 J.M. HILL

2 A No, not necessarily. We didn't discuss  
3 anything much about the principles involved in it.  
4 We all kind of know each other, and we knew that we  
5 were going there, and we presumed they were going  
6 there to defend our southern cultural heritage.

7 Q Did Mr. Kessler discuss with you whether  
8 other participants who didn't share your views should  
9 be included?

10 A No, he didn't. Not to my knowledge.

11 Q Are you familiar with the words  
12 alt-light?

13 A Alt-light?

14 Q As opposed alt-right.

15 A I've heard the term. I'm not sure I know  
16 what it means.

17 Q So let me show you -- let me show you an  
18 exhibit we will mark as Exhibit No. 15.

19 (Hill Deposition Exhibit No. 15 was  
20 marked for the record.)

21 BY MR. LEVINE:

22 Q This is an e-mail and graphic from you  
23 dated June 19, 2017. You're sending it to Dennis  
24 Durham.

25 A Okay.

1 J.M. HILL

2 Q Who is Mr. Durham?

3 A Mr. Durham was our previous Virginia  
4 League of the South state chairman. I think he  
5 resigned shortly before Charlottesville.

6 Q Do you know why he resigned before  
7 Charlottesville?

8 A He said it was personal reasons.

9 Q And was Mr. Durham involved with you in  
10 the planning for the Unite the Right?

11 A Not to my knowledge. I don't remember  
12 that he was.

13 Q Did you send him this press release from  
14 the League for the event?

15 A I may have. I don't recall.

16 Q Take a look at it, sir. And look at the  
17 graphic. Do you see on the top, it says, Unite the  
18 Right, and underneath --

19 A Yes, I see that.

20 Q -- League of the South.com?

21 A Yes, I see that.

22 Q And that -- this was sent on to the state  
23 chair in Virginia for the event, correct?

24 A Hold on just a second. I'm going to get  
25 away from this interference over here.



1 J.M. HILL

2 I'm not sure when I sent that to him. I  
3 probably did. It looks like something I am familiar  
4 with. We passed a lot of those brochures and all  
5 around on-line, and I don't recall exactly who -- to  
6 whom I sent what. It's possible that I sent one to  
7 Mr. Durham.

8 Q And do you see on that -- that banner, it  
9 identifies the free speech rally alt-south,  
10 alt-right, and alt-light -- alt-light, all coming  
11 together to stand against Antifa. Do you see that?

12 A Yeah, I see that.

13 Q And what did you mean then, when you put  
14 alt-light on that banner?

15 A I didn't put it on that banner. I merely  
16 passed that banner on. I had nothing to do with  
17 making that banner --

18 Q Is it your testimony, Mr. Hill, when you  
19 passed this off as a banner on behalf of League of  
20 the South, that you didn't know what these entities  
21 were all about that were identified on the banner?

22 A I had a general idea of what alt-light  
23 meant. I had never --

24 Q Well, what is your general idea, sir?

25 A The general idea is it would be sort of a

1 J.M. HILL

2 mainstream conservative, somebody who might not be  
3 hard right, like we were, like we characterize  
4 ourselves.

5 And alt-south, I just took to mean that  
6 it would be a conservative from the south, sort of an  
7 alt-light type conservative from the south. So I was  
8 really not --

9 Q Mr. Hill -- Mr. Hill, you sent this out  
10 in June of 2017, correct?

11 A Right. That -- as far as -- as far as it  
12 goes -- I think that's what it says on there, so I  
13 presume that is right.

14 Q And your press release says, in part, a  
15 quote from you: Now we look forward to standing with  
16 our allies on the right in Charlottesville --

17 A Right.

18 Q -- if you have southern blood in your  
19 veins and are proud to call yourself a son or  
20 daughter of Dixie, then come and join us.

21 A Right. Correct.

22 Q Now, didn't you come to learn, after you  
23 sent this banner, that members of the alt-light and  
24 alt-south were disinvited as speakers to the Unite  
25 the Right rally and it was going to be made up

1 J.M. HILL

2 exclusively of right wing groups that affiliated with  
3 the alt-right?

4 A Mr. Kessler did not discuss with me his  
5 reasons for inviting or disinviting any people to  
6 speak --

7 Q I asked you, Mr. Hill, didn't you come to  
8 learn --

9 MR. JONES: Please stop  
10 interrupting the witness.

11 BY MR. LEVINE:

12 Q Mr. Hill, you're not answering the  
13 question.

14 A All right. Pose the question again, sir.

15 Q I didn't ask you why it was done.

16 I asked you first if you came to learn,  
17 after you sent this banner, that members of the  
18 alt-light and alt-south were disinvited as speakers  
19 to the Unite the Right rally and it was going to be  
20 made up exclusively of right wing groups that were  
21 affiliated with the alt-right?

22 A No, I do not recall having learned that  
23 from Mr. Kessler.

24 Q Do you remember learning that at all,  
25 sir?

1 J.M. HILL

2 A No, I don't remember learning that at  
3 all.

4 Q Isn't it a fact, sir, that that's what  
5 happened?

6 A I don't know. That was Mr. Kessler's  
7 business, not mine. I don't know what was going on  
8 in his mind regarding inviting or disinviting  
9 anybody. All I know is I showed up to give my speech  
10 and that's all I know.

11 Q Well, were you familiar, in June of 2017,  
12 with -- you were familiar with Mr. Heimbach, correct?

13 A Yes, I've known Mr. Heimbach for several  
14 years.

15 Q And who was Mike Enoch?

16 A I don't know who Mike Enoch is. I've  
17 heard the name, I never met him. I couldn't pick him  
18 out if he walked in front of me, I wouldn't know him.

19 Q Was his other name Peinovich?

20 A I don't know, sir. I told you I don't  
21 know the man.

22 Q And you know Richard Spencer or knew of  
23 Mr. Spencer?

24 A I had a couple of telephone calls with  
25 Mr. Spencer. I'd never met him in-person.

1 J.M. HILL

2 Q Did you have those calls before June of  
3 2017?

4 A Yes, they were in the years past. He had  
5 invited me to speak at one of his events and it was  
6 long before Charlottesville.

7 Q Did you understand his views to be  
8 compatible with views of League of the South?

9 A Yeah, in the sense that he was very pro  
10 European, pro western civilization, yes.

11 Q Did he also share the views of League --  
12 as League of the South in respect to Jews and blacks?

13 A I have no idea. I never really discussed  
14 it with him.

15 Q And what about Augustus Invictus?

16 A At the time, I didn't know who he was. I  
17 had no idea who he was. I never met him. I never  
18 met him at that time.

19 Q Did you learn from Mr. Kessler, in your  
20 conversations, what his views were on white  
21 nationalism?

22 A I don't recall. I don't think so, but I  
23 don't recall for sure.

24 Q Do you know a man by the name of Chris  
25 Cantwell?

1 J.M. HILL

2 A I've heard the name. I've never met him.  
3 I don't know what he believes. I just -- I know he's  
4 some supposed figure of the alt-right. That's all I  
5 know.

6 Q And what about a man by the name of Baked  
7 Alaska?

8 A I've heard the name. Never met him.  
9 Don't know what he believes.

10 Q What about Based Stickman?

11 A Heard the name on social media. I think  
12 he's from the West Coast. Other than that, I don't  
13 know anything about him. Never met him. Don't know  
14 what his views are.

15 Q Did you associate Based Stickman with the  
16 Battle of Berkeley?

17 A That seems to ring a bell.

18 Q What was the Battle of Berkeley?

19 A Well, I can only tell you from what I  
20 learned on social media, mainly, and that was a -- it  
21 was a clash between Antifa -- and I don't know if  
22 Black Lives Matters was involved -- and some right  
23 wingers, and I don't know exactly who they were, but  
24 I understand that it was a pretty serious affair.

25 Q Did you understand that the groups that

1 J.M. HILL

2 would be invited to the Charlottesville rally, Unite  
3 the Right, were going to share your views of southern  
4 nationalism?

5 A No, I had no idea if they would share my  
6 views of that or not.

7 Q Let's mark -- I'm going to mark exhibit  
8 16.

9 (Hill Deposition Exhibit No. 16 was  
10 marked for the record.)

11 BY MR. LEVINE:

12 Q I'm showing you what's been marked as  
13 Exhibit 16.

14 A Okay.

15 Q I believe this is a tweet on your Twitter  
16 account.

17 Can you identify it?

18 A Yes, as best I can. I obviously don't  
19 have access to that Twitter account anymore, but --

20 Q Did you have a Twitter account?

21 A Yes, I did, I had a Twitter account --  
22 the same Twitter account, I think, since 2010, and I  
23 think they took it away from me -- I want to say --  
24 in December of 2017, in the aftermath of  
25 Charlottesville.

1 J.M. HILL

2 So I haven't had access to Twitter  
3 account since December of 2017, so I guess I'll have  
4 to take your word for it, but I saw what you put on  
5 the screen.

6 Q Do you see -- was your Twitter account At  
7 Michael Hill 51?

8 A As best I recall, sir, that was my  
9 Twitter name at that time.

10 Q What does 51 stand for?

11 A That's the day that -- that's the year,  
12 sorry, that I was born, 1951.

13 Q And on or about July 24, did you tweet:  
14 Quote, If you want to defend the south and western  
15 civilization from the Jew and his dark-skinned  
16 allies, be in Charlottesville on 12th August?

17 A If that is an accurate representation  
18 from my actual Twitter account that I had at the  
19 time, I would say that, yes, I did -- I did write  
20 that.

21 Q And when you -- that was a tweet that  
22 went out to the general public, correct?

23 A I don't recall, sir, if it went out to  
24 the general public or not.

25 Q Was -- were you able to restrict your



1 J.M. HILL

2 Twitter account to only people that would subscribe  
3 to your views?

4 A No, I don't think so, and I don't think  
5 that was done in a chat room. So I think by process  
6 of elimination it was sent out to the public.

7 Q And you were calling for all people, if  
8 they agreed with you to defend south and western  
9 civilization from the Jew and his dark-skinned  
10 allies, to go to Charlottesville on August 12th,  
11 correct?

12 A Yes, that was a call to the general  
13 public. We had hoped to have people contact us and  
14 maybe they would, before they went to  
15 Charlottesville, become a member of the League of the  
16 south. And that happened on a number of occasions,  
17 we got new members from calls like that.

18 Q And you were looking for people that were  
19 sympathetic to your white nationalist views, correct?

20 A Well, we were looking for people who were  
21 particularly sympathetic to our southern nationalist  
22 views and would want to defend the southern -- our  
23 southern heritage, in particular the Lee statue.

24 Q The southern nationalist views, as you  
25 said in your writings, your own writings at the very

1 J.M. HILL

2 beginning of this deposition, were southern, slash,  
3 white nationalist views, correct?

4 A Well, yes, and we -- we've already talked  
5 about what the distinction is between those, but yes,  
6 yes, that is true.

7 Q Take a look at the next exhibit, which  
8 we'll have marked as Exhibit 17.

9 (Hill Deposition Exhibit No. 17 was  
10 marked for the record.)

11 THE WITNESS: All right. Let me  
12 walk back over here to my cell phone.

13 THE VIDEOGRAPHER: Mr. Hill, if you  
14 turn your volume down on your phone, you  
15 might not get the feedback.

16 BY MR. LEVINE:

17 Q Do you see exhibit -- what we've marked  
18 as Exhibit 17?

19 A It's not -- it hasn't come up yet. I'm  
20 waiting for it. Okay.

21 Yes, I see that. I remember getting that  
22 from Jason Kessler.

23 Q This was this secret operational document  
24 for the Unite the Right rally, correct?

25 A That is correct. Yes.

1 J.M. HILL

2 Q And he shared that with you in June?

3 A Yes, he did.

4 Q And he asked you not to share it with  
5 anyone else, correct?

6 A That is correct. It was simply for the  
7 leadership of all the groups that were involved or  
8 anybody else that he felt like needed to know.

9 Q And in the operation -- did you read it  
10 after you got it?

11 A Yes, I did.

12 Q In fact, when you read it, you were not  
13 comfortable entirely with the security arrangements  
14 that were included within it; isn't that right?

15 A That is correct, sir.

16 Q And you took steps to provide your own  
17 security for getting in and out of the park, correct?

18 A Correct.

19 Q But in other respects regarding the  
20 operation and the conduct of the rally content-wise,  
21 you were comfortable with signing up and  
22 participating; isn't that right?

23 A That is correct.

24 Q And don't you -- here, you say this:  
25 Rally -- it's down in the first large paragraph --

1 J.M. HILL

2 this rally, like the Battle of Berkeley, will be a  
3 chance to show the left in one of their central power  
4 hubs that they will no longer go unopposed like they  
5 are used to with older generations of white wingers.

6 Did you read that?

7 A Let me step back over here and take a  
8 look at that. Is that in the same e-mail?

9 Q Yes, it's in the first page of Operation  
10 Status.

11 A Oh, okay. I didn't -- I didn't think  
12 like that sounded like something I wrote.

13 Q It's what was written that you reviewed?

14 A Yes, yes. I don't -- I don't remember  
15 exactly what is in that document, I just know that  
16 when -- when I read it, I was not happy with the  
17 security arrangements and, because of that, we  
18 basically pushed it aside. I don't think I ever  
19 looked at it again, to tell you the truth.

20 Q But what did you understand the Battle of  
21 Berkeley to mean?

22 A Well, I knew what it meant. It was a  
23 clash that we've already discussed regarding Based  
24 Stickman. It was a clash between Antifa and Black  
25 Lives Matter, I believe, and some right wing groups

1 J.M. HILL

2 that were demonstrating. I don't know who had a  
3 permit or anything like that. I forget. But I know  
4 it turned into a serious brawl in Berkeley.

5 Q And it turned violent; isn't that right?

6 A Yes, absolutely it turned violent.

7 Q And you expected this rally to be like  
8 Battle of Berkeley; isn't that right?

9 A I didn't write this in this document that  
10 you're talking about.

11 Q I asked you first whether you expected.

12 A I expected the possibility of trouble  
13 because of what I had -- what I had seen prior to  
14 this.

15 Q And you knew that Mr. Kessler, since he  
16 had written this, also expected violence; is that  
17 right?

18 A I would assume that from what he wrote.

19 Q And your -- one of your objectives in  
20 going to Charlottesville was to show the left that  
21 they would not be opposed in a rally, correct?

22 A You kind of faded out on me. Please say  
23 that again.

24 Q One of your objectives, as described in  
25 this document, was to show the left that there was

1 J.M. HILL

2 solidarity on the right as far as its issues went?

3 A Yes, we wanted to show solidarity in  
4 defense of the Lee statue, in particular, at  
5 Charlottesville, yes.

6 Q And you wanted to show that solidarity to  
7 the Black Lives Matter group, correct?

8 A We wanted to show it to the world,  
9 including our opposition, but also our friends, our  
10 potential friends.

11 Q No, I'm asking you about your enemies.  
12 You wanted to show your position to the  
13 Black Lives Matter group, correct?

14 A We wanted to show our position to  
15 everyone in Charlottesville that day, including our  
16 enemies, yes.

17 Q And your enemies included the Black Lives  
18 group, correct?

19 A Our enemies included everybody that was  
20 in the streets there in opposition to us in  
21 Charlottesville and who wanted -- yes.

22 Q Mr. Hill -- Mr. Hill, when you were  
23 planning to go --

24 A Yes.

25 Q -- you knew that the Black Lives Matter

1 J.M. HILL

2 group would be there and you wanted to show your  
3 solidarity against them, correct?

4 A I don't think so. I think what we wanted  
5 to do was more a positive thing, and that is to show  
6 our support for our cultural heritage and --

7 Q Was engaging in violence with them going  
8 to be a positive thing as far as you were concerned?

9 A No, absolutely not. We didn't -- we  
10 didn't plan on that happening. We knew it was a  
11 possibility, but we didn't plan on it happening. We  
12 planned to go and we planned to have a good time in  
13 the park and I planned to speak.

14 Q I'm not saying -- isn't it a fact,  
15 Mr. Hill, that you saw the opportunity with  
16 violence -- for violence with the Black Matters group  
17 as something positive for --

18 A No.

19 Q -- the Unite the Right rally?

20 A No, absolutely not.

21 Q You didn't?

22 A No, I didn't see violence as a positive  
23 thing.

24 Q You didn't?

25 A No.

1 J.M. HILL

2 Q Did you also want to show solidarity with  
3 the white nationalist group to send a message to the  
4 Jews in Charlottesville?

5 A No. Our goal was to go and to defend the  
6 monument and for me to speak in defense of it.

7 Q You -- you're familiar with the chant  
8 Jews Will Not Replace Us?

9 A Yes, I heard -- I've seen the video of  
10 August the 11th, the evening before August the 12th,  
11 and I -- and I heard something that sounded something  
12 like that from the people who went to the University  
13 of Virginia for that rally.

14 Q And you heard -- you heard the chant  
15 Blood And Soil, correct?

16 A I do believe I heard that on the same  
17 night, yes.

18 Q And that chant expresses the Nazi  
19 imagery; isn't that correct?

20 A Yes, that is correct, it could be  
21 construed that way.

22 Q So is it your testimony that the  
23 participants in the Unite the Right rally didn't  
24 intend to convey to the Jewish community of  
25 Charlottesville the words that -- the meaning of the



1 J.M. HILL

2 of the words Jews Will Not Replace Us and Blood And  
3 Soil?

4 A Sir, the League of the South did not  
5 participate in that event on Friday night, August the  
6 11th. I don't know what their goal was. We were not  
7 there. We did not participate in it.

8 Q Mr. Hill, you didn't disavow the torch  
9 light rally on August 11th, did you?

10 A I didn't disavow it, I didn't support it.  
11 It happened.

12 Q You know members of League of the South  
13 attended the torch light rally, don't you?

14 A If they did, they attended on their own  
15 accord. They didn't attend officially as League of  
16 the South members because we had a meeting at our  
17 lodging that night to plan for the next day. So I --  
18 if they went, they went on their own accord, and I  
19 don't know who they are if they went. So --

20 Q You didn't decide not to participate in  
21 the torch light rally for tactical reasons. You  
22 decided not to participate because you had a group  
23 meeting regarding the next day; isn't that right?

24 A Yes, that's exactly right. We wanted to  
25 make sure that our plans for getting in and out of

1 J.M. HILL

2 Charlottesville safely were what they should be, and  
3 that's why we met the previous night and did not  
4 attend the torch light rally.

5 Q But you never -- you didn't drop out of  
6 the rally on August 12th because of the additional  
7 rally that was going to take place on August 11th,  
8 did you?

9 A I'm not sure I understand your question.

10 Q Well, you learned months beforehand that  
11 a torch rally was planned for August 11th; isn't that  
12 right?

13 A I don't recall when I learned that. I --  
14 I just can't -- I can't remember.

15 Q But it was before August 11th, right?

16 A I can't remember, sir. I don't know when  
17 I learned that there was going to be a torch light  
18 rally on August the 11th.

19 Q Isn't it a fact that you learned before  
20 August 11th that there was going to be a torch light  
21 rally?

22 A I don't remember.

23 Q Whenever you learned there was going to  
24 be a torch light rally, did you -- did you disavow  
25 it?

1 J.M. HILL

2 A No, I did not.

3 Q And you supported the notion of a torch  
4 light rally, it's just the League of the South was  
5 going to do other business; isn't that right?

6 A No, that's not right. I didn't care one  
7 way or the other whether they had a torch light  
8 rally. It's not what we went up there to do. So I  
9 couldn't have cared lease what they did one way or  
10 the other.

11 Q At the end of the day, you liked the fact  
12 of the torch light rally; isn't that right?

13 A No, I didn't -- I didn't like it. I  
14 didn't dislike it.

15 Q You didn't approve of it?

16 A I didn't approve of it. I wasn't opposed  
17 to it. I didn't care one way or the other, as I  
18 said --

19 Q Isn't it a fact, after the events, that  
20 you described the torch light rally as successful?

21 A I don't recall having said anything at  
22 all about the torch light rally after the event. We  
23 weren't a part of it.

24 Q Didn't you say at one point that the  
25 optics of the torch light ceremony in Charlottesville

1 J.M. HILL

2 was very impressive?

3 A I don't recall having said that.

4 Q Didn't you say that the League of the  
5 South would -- would have their own torch light  
6 ceremonies because the optics were too good to pass  
7 up?

8 A I don't recall saying that. I'm not  
9 saying I didn't say that at one point after viewing  
10 the video of it, but I don't remember saying it.

11 Q Well, let's -- let's see if this  
12 refreshes your recollection.

13 A All right.

14 Q Eighteen, exhibit -- a video. It's an  
15 audio. It's not a video, sir. It's an audio.

16 (Hill Deposition Exhibit No. 18 was  
17 marked for the record.)

18 BY MR. LEVINE:

19 Q It's a conversation on -- on the radio  
20 between you and Harold Crews.

21 Was Harold Crews a member of the League  
22 of the South?

23 A Yes.

24 Q Listen to this, sir.

25 AUDIO EXHIBIT PLAYED: (The

1 J.M. HILL

2 demonstrations, marches, there's been some  
3 successful ones in 2017?

4 Oh, yes. Absolutely. I'm not  
5 going to let the cat out of the bag about  
6 where and when those might be, but I will  
7 say definitely, yes.

8 All right. So if you come to a big  
9 event --

10 The optics of those are just too  
11 good to pass it up.

12 So if you come to a League event,  
13 just bring your tiki torch, just in case.

14 Yeah, and we may -- we may go old  
15 school with some of these torches. We  
16 may actually make some true flambeaux,  
17 you know, something with -- some pine tar  
18 torches. Yes, exactly, and, you know,  
19 go -- go medieval, as you might -- might  
20 say, with these things. That would be  
21 fun. But yeah, that's -- that's in the  
22 plans, Harold, I'm proud to say. Good  
23 optics. Good optics.

24 It sure did look good having those  
25 hundreds of men and a few women marching

1 J.M. HILL

2 there in Charlottesville on August the  
3 11th.

4 Yes, it did. That was very  
5 impressive. Very impressive.

6 And we want to see if maybe we can  
7 beat that.)

8 BY MR. LEVINE:

9 Q Does that refresh your recollection, sir?

10 A Yes, it does. Could you give me a date  
11 on that radio broadcast?

12 Q It was January -- I believe it's  
13 January 2018.

14 A Okay. Yeah, by that time I had had a  
15 chance to see a lot of video of what had happened  
16 on -- at the University of Virginia on Friday night,  
17 August the 11th and, in my opinion, it was very  
18 impressive. Very impressive demonstration.

19 But, you know, we're talking here several  
20 months after the fact, after I had a chance to, you  
21 know, see the video and things such as that. At the  
22 time, I had no idea what was going on with it. As I  
23 said, the League was not a part of it.

24 Q And the League -- just to be clear, the  
25 League wasn't a part of it because you had a meeting

1 J.M. HILL

2 planned with the members to discuss the following  
3 day?

4 A Yes, that's right.

5 Q And isn't it a fact that, even though you  
6 didn't send members of the League officially as a  
7 whole group, that you did send several as observers?

8 A I was aware after the fact that there  
9 were several -- when I say several, I don't know  
10 whether it was two or three or more than that. But I  
11 learned after the fact that there were a few League  
12 members that went over there to see what was going  
13 on, but we didn't officially send anybody over there  
14 because we didn't -- I don't recall even learning  
15 about something going on at the University of  
16 Virginia like that until actually that night, when  
17 somebody came in and -- I forget who it was -- and  
18 said there was something going on at the University  
19 of Virginia. And, well, that's something I don't  
20 know about.

21 So I think -- obviously, I think a couple  
22 of guys may have gone over there. I don't know I  
23 don't know who they were and I don't -- they never  
24 reported back to me about what they saw. So --

25 Q Isn't it a fact, Mr. Hill, that you knew

J.M. HILL

there would be a torch light rally on August 11 that you decided that League of the South would not participate because it had a meeting, but that you had decided to send two observers on your behalf to report back to you what happened?

A I do not recall the exact time that I found out about this torch rally on --

Q Well, just testified --

A -- Friday the 11th.

Q You just testified, sir, that you didn't know beforehand but you found out later that several members went. Isn't it in fact just the opposite, that you knew ahead of time and you sent two observers on your behalf to report back to you what happened?

A I learned -- the first recollection that I have of the torch light rally was sometime a few hours, at most, before it actually happened. So at the earliest it probably would have been the late afternoon of Friday the 11th. I don't recall asking anybody to go and report back to me.

Q Do you recall saying that you would be sending two observers to it?

A I don't recall saying anything like that.



1 J.M. HILL

2 I just -- I can't remember it. I don't think that --

3 I don't think that I wrote anything like that. I

4 don't think I said anything like that. I could --

5 Q Let's mark as Exhibit 19 a document --

6 it's an e-mail dated August 11th.

7 (Hill Deposition Exhibit No. 19 was

8 marked for the record.)

9 BY MR. LEVINE:

10 Q Take a look at it?

11 A Okay. Hold on. I've got to get my phone

12 back on here. It's cut off. It's overheating. Hold

13 on just a second.

14 MR. LEVINE: Mr. Hill? We've lost

15 the witness. We've lost Mr. Hill.

16 THE WITNESS: Okay. I've got my

17 phone back on. I can see the document

18 for this.

19 BY MR. LEVINE:

20 Q Didn't you receive an e-mail at 7:48 p.m.

21 from a gentleman, Gordy Lockerbie, G-O-R-D-Y,

22 L-O-C-K-E-R-B-I-E, who wrote you: Torch light rally

23 time and location has been leaked and Antifa is

24 posting that they will be there.

25 A Right.

1 J.M. HILL

2 Q The LS is in attendance. Be cautious.

3 Do you see that?

4 A Yes: Thanks but this is not our game.

5 We are sending two observers.

6 Okay. I stand corrected. I simply  
7 forgot.

8 Q And doesn't the fact that Mr. Lockerbie  
9 is sending you an e-mail that night identifying that  
10 torch light rally and time has been leaked --  
11 withdrawn.

12 First of all, Mr. Lockerbie was a member  
13 of League of the South; is that correct?

14 A Yes, he was at the time.

15 Q And was he in attendance that weekend?

16 A No, he wasn't.

17 Q And was he -- this wasn't the first time,  
18 at 7:48 p.m., that you were learning of a torch light  
19 rally that was planned; isn't that right?

20 A Yes, I think that it was, as I said  
21 earlier, probably that afternoon, late afternoon,  
22 when I first heard of it, as best as I recollect.

23 Q You are really testifying under oath that  
24 you don't recall learning from any of the other  
25 League of the South members or from Mr. Kessler that

1 J.M. HILL

2 there was going to be a torch light rally before --

3 A I do not remember.

4 Q -- the event of August 11?

5 A I do not remember hearing that there was  
6 going to be a torch light rally before that actual  
7 day, late afternoon. That's the best of my  
8 recollection, that's all I can say. I can't remember  
9 it.

10 Q Isn't it a fact, Mr. Hill, that you knew  
11 that a torch light rally would be part of the plans  
12 for a number of weeks, maybe months, and that you  
13 understood that it was going to be secret, that no  
14 permit would be sought, that the police would not be  
15 told until the very end; isn't that correct?

16 A I do not recall that, sir.

17 Q None of that? None of that rings a bell  
18 to you?

19 A No, I don't recall having known in  
20 advance about a torch light rally without a permit at  
21 the University of Virginia. I don't recall it.

22 Q Now, besides Mr. Schoep and Mr. Heimbach  
23 and Mr. Kessler, did you discuss with anyone else  
24 outside League of the South the plans for the event?

25 A Besides Schoep, Kessler and Heimbach?

1 J.M. HILL

2 Q Correct.

3 A Not as I recall.

4 Q And who within the League did you discuss  
5 the plans for the event?

6 A I discussed it with Robert Baker, who  
7 subsequently became my chief of operations. I  
8 discussed it with Michael Tubbs, my chief of staff.  
9 I discussed it with a fellow by the name of J.C.  
10 Adams, who was my logistical -- logistical man at the  
11 time, because he was getting accommodations for us.

12 I discussed it with our chief medical  
13 officer, Selina Richey, because we were going to take  
14 our medical staff there in case there was need for  
15 it, and there certainly was. I discussed it with our  
16 communications officer, Pat Hines, because of  
17 communications, obviously. I discussed it with Brad  
18 Griffin because of the public relations aspect.

19 So I would say that I discussed it with  
20 Mr. Baker and then with my staff members, which would  
21 have been six, seven people at most.

22 Q And did you discuss it with Mr. Tubbs?

23 A With who now?

24 Q Tubbs.

25 A Mr. Tubbs? Yes, I discussed it with

1 J.M. HILL

2 Mr. Tubbs. He's my chief of staff.

3 Q And did you ask all of these people who  
4 you were discussing the events with to keep you in  
5 the loop about the plans?

6 A There's some interference on the line,  
7 sir. Repeat that last question.

8 Q I think it's the birds that are tweeting  
9 in Alabama, sir.

10 A I don't hear them except on the phone.  
11 So -- yeah, I hear them now.

12 Q I want you to know that the birds' tweets  
13 sound the same in Alabama as in New York.

14 A That's good. Repeat the question. I  
15 thought I heard it but I want to make sure.

16 Q So I want to show you exhibit -- I'm  
17 going to show you Exhibit 20.

18 A Okay.

19 (Hill Deposition Exhibit No. 20 was  
20 marked for the record.)

21 BY MR. LEVINE:

22 Q This is an e-mail between you and Michael  
23 Tubbs?

24 A Okay.

25 Q On July 12th, 2017.

1 J.M. HILL

2 A All right. Yeah, I recall that.

3 Q And what did you ask Mr. Tubbs to do?

4 A I'm not -- I can't remember right  
5 offhand. That e-mail doesn't give me any -- any hint  
6 of what I may have asked him to do in this case,  
7 other than just to stand by and get ready to approve  
8 Mr. Baker's final plan here.

9 And I noticed it mentioned the Pikeville  
10 template there. And that's kind of what we expected  
11 at Charlottesville.

12 Q All right. Let me show you -- well, did  
13 Mr. Baker keep you in the loop on what he was doing?

14 A Yes, he did. He -- we communicated quite  
15 often.

16 Q So let me show you Exhibit 20. I'm going  
17 to show you a tab -- I'm going to show you Exhibit  
18 21.

19 A All right.

20 (Hill Deposition Exhibit No. 21 was  
21 marked for the record.)

22 BY MR. LEVINE:

23 Q Is Exhibit 21 an e-mail from you to Mike  
24 Tubbs on July 11th, 2017?

25 A Okay.

1 J.M. HILL

2 Q Can you read that, sir?

3 A I don't see it yet.

4 Q Can you see it?

5 A Yes. Yes. What is the date on this?

6 Q July 11.

7 A Okay. Right. Okay. Yes, I see it.

8 Q And that was from you to Mr. Tubbs?

9 A Correct.

10 Q And do you see there you say: I'd like  
11 for you to once again be in command of general  
12 operations?

13 A Yes.

14 Q What did you mean by that?

15 A He was in command of our general  
16 operations in New Orleans back in early May, when we  
17 were there defending the Robert E. Lee statue there  
18 in New Orleans.

19 Q And did general operations include  
20 leading -- leading the troops in the park in a march?

21 A General operations means everything that  
22 we do on the ground that a -- whether it's marching  
23 or, you know, getting people in line, keeping  
24 people doing what they're supposed to be doing in a  
25 general sense.

1 J.M. HILL

2 Q And if it's what you do on the ground and  
3 it deals with marching, you would expect Mr. Tubbs to  
4 be in the front, correct?

5 A Yes, and -- yeah, and that's exactly  
6 where he was.

7 Q And if there were an instruction to go or  
8 to fight or to not fight, that would be Mr. Tubbs's  
9 direction, correct?

10 A No, sir. That direction comes from me.

11 Q On that day, were you in a position to be  
12 giving Mr. Tubbs instructions for everything that he  
13 did?

14 A On August the 12th --

15 Q Yes, sir.

16 A -- 2017?

17 Q Yes, sir.

18 A No. It's not always in position to do  
19 that. At your --

20 Q So did he have authority as commander of  
21 general operations to make those decisions?

22 A He did have that command in my absence.

23 Q Let's take a look at Exhibit 22.

24 (Hill Deposition Exhibit No. 22 was  
25 marked for the record.)



1 J.M. HILL

2 BY MR. LEVINE:

3 Q Is this an e-mail the same day,  
4 July 11th, from you to Mr. Tubbs?

5 A Okay.

6 Q And did you tell Mr. Tubbs that you told  
7 Ike Baker to talk to law enforcement in  
8 Charlottesville?

9 A That is correct, sir.

10 Q And when you say: He tells me the CPD  
11 chief is high yellow, what does that refer to?

12 A That he's a white-skinned black male.

13 Q And what does Jewed shrine refer to?

14 A Jewish pig.

15 Q Pardon?

16 A Jewish pig.

17 Q And that was your reference to the mayor  
18 of Charlottesville?

19 A Yes, it was.

20 Q Now, did you -- let's put that exhibit  
21 down.

22 Did you instruct League members for  
23 specific attire for the Unite the Right rally?

24 A We recommended that they bring defensive  
25 accouterments, such as helmets and other things that

J.M. HILL

may protect certain areas of the body. And we provided -- the League of the South provided a dozen shields that we made ourselves, to the people in the front of our lines.

So yes, we did suggest that our members come prepared for whatever Antifa and Black Lives Matter might throw at them or hit them with or whatever, and to protect -- to be able to protect their heads, in particular.

Q But didn't you also recommend that the attire to be khaki pants and black shirts?

A Oh, yeah, we always do that. We have -- we have a standard uniform that we wear in public like that so people can identify us.

Q And did you also direct people to bring flags?

A To bring what now?

Q Flags.

A Flares, F-L-A-R-E-S?

Q No. Flags, F-L-A-G-S.

A Oh, flags, I'm sorry. Oh, yes, of course, we recommended people to bring flags.

Q And what flags are typical when League of the South makes a public appearance?

1 J.M. HILL

2 A The Confederate battle flag and our own  
3 Southern Nationalist League flag, which is a black  
4 cross on a white background.

5 Q And did a number of members bring those  
6 flags?

7 A Yes.

8 Q And did you -- did you discuss weapons  
9 with members of the League of the South?

10 A Yes, we did. I had Mr. Baker, among  
11 other things, check the Virginia law code about what  
12 weapons were legal and what weapons were not, and we  
13 advised our people to stay within the law, not to  
14 violate the law as far as weapons went, and to make  
15 their own personal decisions about what to bring.

16 And that was pretty much the extent of  
17 our discussion with them. We posted something on the  
18 website about it.

19 Q Did you also talk to the members about  
20 shields?

21 A Yes, we did when -- prior to this --

22 Q You just testified -- you just testified  
23 that you made -- you had 12 shields made?

24 A Yes, we did. We had 12 shields made  
25 internally. One of our members volunteered to make

1 J.M. HILL

2 the shields and brought 12 of them. And we brought  
3 them with us and we handed them out that morning, the  
4 12th of August, to certain members and told them that  
5 these were for defensive purposes.

6 Q Now, you knew, did you not -- well, you  
7 had the meeting on the night of August 11th with all  
8 the people participating the next day?

9 A Well, it was not for all the people  
10 participating the next day. It was mainly for the  
11 League members who had arrived. Some people didn't  
12 arrive until Saturday morning, the 12th. And this  
13 was for the people who were there at our particular  
14 location where we were staying, including our  
15 officers like Mr. Tubbs and Ike Baker and others.

16 MR. LEVINE: Let's take a break  
17 right now. It's 2:20 p.m. in New York.  
18 We've been going about two hours. Let's  
19 take a five-minute break. Okay.

20 THE VIDEOGRAPHER: The time is  
21 2:20 p.m. We're off the record.

22 (Brief pause.)

23 THE VIDEOGRAPHER: The time is  
24 2:37 p.m. We're on the record.

25 BY MR. LEVINE:

1 J.M. HILL

2 Q Thank you, Mr. Hill.

3 A Sure. Sorry about the technical  
4 confusion.

5 Q So I asked you earlier, besides -- I  
6 asked you earlier about your contacts with people not  
7 in League of the South regarding the plans for the  
8 Unite the Right rally. And you identified three  
9 people that you talked to, Jeff Schoep, Matt  
10 Heimbach, and Jason Kessler.

11 Is there anybody else that you talked to  
12 about participating in the events for the Unite the  
13 Right rally?

14 A At this point, I can't remember any. I'm  
15 not saying that there are not some I talked to, but I  
16 don't remember who they would be outside of the  
17 League. I know it was those three I talked to  
18 mainly.

19 Q And within the League, you were dealing  
20 with Ike Baker and with Michael Tubbs and with Brad  
21 Griffin, and who else did you say within the League?

22 A Our communications chief at the time was  
23 Pat Hines, our logistics officer was J.C. Adams.

24 Q Okay. Now, do you know a man by the name  
25 of David Duke?

1 J.M. HILL

2 A Yes, I know David.

3 Q And did you discuss Unite the Right rally  
4 with David Duke?

5 A Yes, I did, because Jason Kessler, at  
6 some point in the summer, asked me if I would contact  
7 Duke, Mr. Duke -- or Dr. Duke, rather -- to see if he  
8 might be interested in being a speaker.

9 Q And so that would be an additional person  
10 that you didn't testify to before, correct?

11 A Yes, but only in the sense that I asked  
12 him if he would be interested in speaking. I didn't  
13 really discuss the plans or anything for the rally  
14 with Mr. Duke because he's not a League of the South  
15 member and he was not a leader of a group or  
16 anything.

17 I merely contacted him at Mr. Kessler's  
18 request to see if he would be interested in being a  
19 speaker.

20 Q How did you know -- how did Mr. Kessler  
21 know that you knew Mr. Duke?

22 A He didn't. In one of our phone  
23 conversations, I believe it was, he asked me if I  
24 knew him and I told him that I -- that I did.

25 Q And how many conversations did you have

1 J.M. HILL

2 with Mr. Duke about participating at Charlottesville?

3 A I think only one.

4 (Hill Deposition Exhibit No. 23 was  
5 marked for the record.)

6 BY MR. LEVINE:

7 Q I'm showing what we're going to mark as  
8 Exhibit 23, which is your e-mail exchange with --  
9 with Mr. Baker, in the middle of July.

10 We'll start at the bottom, if you scroll  
11 to the bottom of Exhibit 23, the first e-mail on this  
12 chain is from you to Ike Baker, correct?

13 A Right, that's correct, yes.

14 Q On your ProtonMail addresses, correct?

15 A That is correct.

16 Q And it says: I spoke with Mr. Kessler  
17 about inviting David Duke to speak. He agreed to  
18 have him give the keynote speech at the after-event  
19 gathering.

20 Do you see that?

21 A Yes, I see that.

22 Q And does this refresh your recollection  
23 how many conversations you had with Mr. Duke?

24 A No, I don't think it was more than one or  
25 two, I don't think. The best I can remember.

1 J.M. HILL

2 Q Well, it was more than one; is it your  
3 testimony?

4 A I'm not sure. One, or perhaps, two. I  
5 really don't recall. I know it was at least one.

6 Q And at this time, were you also working  
7 with Jeff Schoep about -- about the plans for the  
8 event --

9 A Yes, I had --

10 Q -- for the rally?

11 A Yes, I had contacted him about plans for  
12 the event.

13 Q And what kind of discussions did you and  
14 Mr. Schoep have?

15 A We wanted to coordinate about where to  
16 meet up outside of Charlottesville so we could all  
17 drive in together and park at the parking garage on  
18 East Market Street where we would all stay together  
19 for security reasons.

20 So I was discussing with them the  
21 logistics, particularly of meeting beforehand and of  
22 getting into Charlottesville and getting -- getting  
23 ourselves on the ground there safely in an organized  
24 manner.

25 Q So we're talking about a conversation



1 J.M. HILL

2 that you had with Jeff Schoep, correct?

3 A Yes. I was talking to Mr. Schoep about  
4 this issue, yes.

5 MR. LEVINE: And Madam Reporter,  
6 your answer before identified Mr. Duke in  
7 the conversation that I just elicited --  
8 elicited from the witness was related to  
9 Mr. Schoep.

10 BY MR. LEVINE:

11 Q Let's proceed. So you -- in the  
12 conversations -- the conversations with Mr. Schoep  
13 were about coming into -- coming into Charlottesville  
14 together, correct?

15 A Yes, that was our main concern, is  
16 coordinating coming in all together for security  
17 reasons and then to make organization simpler.

18 Q And in response to your e-mail it to Ike  
19 Davis [sic] about Duke, he then told you about his  
20 contacts with Mr. Schoep, correct?

21 A Yes.

22 Q Do you see it says: In my view -- this  
23 is Mr. Davis speaking to you -- every other reason  
24 for we discuss proceeding as an ad hoc advance party  
25 remains in place. I'm arranging a conversation with

1 J.M. HILL

2 Jeff Schoep. Upon his acceptance of the conditions  
3 you laid out last night, the planning of Operation  
4 Shoo Fly begins in earnest.

5 Do you see that?

6 A Yes, I see that.

7 Q And what conditions -- first of all, what  
8 was Operation Shoo Fly?

9 A That was our meeting all four of the  
10 groups that we've discussed under the Nationalist  
11 Front banner. That was our meeting on the outskirts  
12 of Charlottesville on Saturday morning, the 12th of  
13 August, our proceeding from there into the parking  
14 garage on East Market Street by the police  
15 department, and from there our march down to what at  
16 the time was known as Lee Park. That was -- that was  
17 it.

18 Q So you -- so just to be -- so I  
19 understand correctly.

20 When you saw the original operations  
21 manual, you testified that you were unhappy with the  
22 security arrangements and were going to make them for  
23 yourselves, correct?

24 A That is correct.

25 Q And when you proceeded to make them for

1 J.M. HILL

2 yourselves, was that in tandem or together with your  
3 allies from the Nationalist Front, including  
4 Mr. Schoep with NSM?

5 A We took the lead in this. When I say we,  
6 the League of the South. We made the plans and we  
7 asked the other groups if they would agree to follow  
8 our plans, and they agreed to do that.

9 Q And they -- and you did -- and they said  
10 yes, correct?

11 A And they said yes, that they liked our  
12 plan for meeting on the outskirts of town and driving  
13 in together as a convoy, for all meeting at the  
14 parking garage at East Market Street and all going  
15 into the park together for security and convenience  
16 reasons. Yes, they liked our plan.

17 Q And in this -- this is the plan -- this  
18 is the arrangements that you laid out separate from  
19 the larger group, all of which were going to join at  
20 the park -- all of you were going to be joining at  
21 the park on the morning of the 12th, correct?

22 A As far as I knew, that was what was going  
23 to happen. I didn't know what -- exactly how the  
24 other side or the other group of people there for the  
25 rally, other people that had decided to use Kessler's

1 J.M. HILL

2 plan, we didn't know exactly how they were going to  
3 get to the park, when they would be coming in or what  
4 direction they would be coming from. So --

5 Q But the plan -- the plan, if I'm correct,  
6 was that the groups would come, essentially, from  
7 different directions, all meeting in the park  
8 together for the rally?

9 A We didn't know that at the time. We  
10 didn't know what direction that the rest of the  
11 people that were going by Mr. Kessler's plan, we did  
12 not know what direction or directions they would be  
13 coming into the park.

14 Q But you all agreed that you would be  
15 joining together in the park?

16 A Yes, that was the assumed -- I mean, we  
17 didn't -- I don't think anybody used those words, but  
18 that was the assumption, that everybody coming for  
19 the rally would eventually meet up in the park.

20 Q And -- so go to the next e-mail, where  
21 you said: Thanks -- you said to Mr. -- Ike is  
22 Mr. Davis, correct? I mean, Mr. Baker?

23 A Mr. Baker, yes.

24 Q I may have referred to him incorrectly as  
25 Mr. Davis.

1 J.M. HILL

2 A Yes, you did. I knew who you were  
3 talking about.

4 Q Okay. We both know who you were talking  
5 about.

6 A Sure.

7 Q You say to Ike: Thanks for the report.  
8 Keep me posted and I'll do likewise.

9 Correct?

10 A Right, correct.

11 Q And then, later on that evening -- yeah,  
12 on 11:09 p.m., Mr. Baker wrote you: Jeff Schoep is a  
13 hundred percent on board. He accepted our terms  
14 unequivocally and without hesitation.

15 A Right.

16 Q And by on board, as your terms, that  
17 refers to the means of transportation into the park  
18 on the morning of the 12th?

19 A Yes, that -- that was our -- he agreed to  
20 our prearranged meeting spot on the outskirts of  
21 Charlottesville, where everybody would come and leave  
22 their vehicles, and we would all get into vehicles,  
23 every seat filled, and we would convoy from there  
24 into Charlottesville to the parking garage on East  
25 Market Street and then proceed from there to the park

1 J.M. HILL

2 together. Yes, that was what he agreed to.

3 Q And that included, did it not,  
4 Mr. Heimbach and the TWP?

5 A Yes, Mr. Heimbach also was contacted  
6 about this plan and he agreed to it, as well. I  
7 don't know what means were used to contact  
8 Mr. Heimbach, whether it was e-mail, whether it was a  
9 phone call. I can't remember if -- I can't remember.  
10 I talked to him a couple of times myself, but I don't  
11 remember the subject matter or the conversation.

12 I think Mr. Baker probably presented the  
13 outline of the plan to Mr. Heimbach, but he agreed  
14 with it, as well.

15 Q And so if there aren't e-mails in respect  
16 to your conversations with Heimbach, it's because  
17 they were by phone; is that right?

18 A Because they were what, sir?

19 Q By phone?

20 A Oh, yes, yes. If -- they would have been  
21 either by -- by phone or I don't know if he and  
22 Mr. Baker had a chance to get together face-to-face  
23 before the Unite the Right rally. I'm just not aware  
24 one way or the other of that.

25 Q Now -- now around this time, did you get

1 J.M. HILL

2 a call from one of the organizers and understand that  
3 there was an Antifa strategy to show up at the rally?

4 A You kind of faded out on part of that  
5 question. Please repeat it, sir.

6 Q Around this time did you get a call from  
7 one of the organizers and understand that there was  
8 an intended strategy by Antifa to show up at the  
9 rally?

10 A I don't recall. I don't recall having  
11 gotten a call from anyone --

12 Q All right.

13 A -- regarding that.

14 (Hill Deposition Exhibit No. 24 was  
15 marked for the record.)

16 BY MR. LEVINE:

17 Q Let me mark Exhibit 24, and ask you to --  
18 it's an e-mail chain between you and Mr. Tubbs --

19 A Okay.

20 Q -- the week earlier. The first one is on  
21 July 7.

22 A Okay.

23 Q That's -- LSPRES is you, correct?

24 A Yes, LSPRES is me.

25 Q And that's to Tubbs, Baker, Hines,

1 J.M. HILL

2 Malone, Thomey, Gaborro, correct?

3 A Correct, yes.

4 Q And it says: Gentleman, I received a  
5 call this morning from the organizer of the upcoming  
6 event -- Charlottesville event.

7 A Okay. That was Jason Kessler. I thought  
8 you meant somebody other than Kessler.

9 I do recall Kessler calling me up and  
10 saying that he heard that Antifa was going -- had had  
11 a meeting in DC, which is fairly close, of course, to  
12 Charlottesville, and that they would be coming. So,  
13 yes, I do remember that, but it was Kessler who --  
14 who said that, if memory serves.

15 Q And this -- and Kessler told you that --  
16 that the upshot of the meeting that they got  
17 information about was that Antifa was going to show  
18 up in large numbers in Charlottesville?

19 A Yes, that was the -- that was the gist of  
20 what he told me that he learned from this purported  
21 Antifa meeting in DC, yes.

22 Q And there would be explosives, firearms  
23 and various other weapons to use against you,  
24 correct?

25 A I -- I don't see the rest of the e-mail



1 J.M. HILL

2 down there. I can't remember all the details, but  
3 he -- he was pretty animated when he -- yeah, I see  
4 now. He was pretty animated and pretty concerned  
5 about this. So --

6 Q Now, this -- this information didn't come  
7 as any surprise to you, did it?

8 A No. No, it didn't, having been familiar  
9 with Antifa and what they had done in other places,  
10 particularly on the West Coast. No, it didn't come  
11 as any surprise to me.

12 Q As a matter of fact, you and your  
13 colleagues were looking forward to mixing it up with  
14 Antifa and their supporters; isn't that right?

15 A No, it's not.

16 Q Well, Mr. Tubbs answered your e-mail;  
17 isn't that right?

18 A Well, I don't know. That's been a while  
19 back and -- if you have an e-mail --

20 Q I'm going to show --

21 A If you have an e-mail showing him  
22 answering it, then the answer to that, I guess, is  
23 yes but I can't remember right offhand.

24 Q So why don't you look at the exhibit,  
25 right above it.

1 J.M. HILL

2 A Okay.

3 Q So does that refresh your recollection  
4 that Mr. Tubbs responded to you very soon thereafter  
5 and said --

6 A Let me -- let me read it here.

7 Q I'll read it for the court reporter.

8 A Okay.

9 Q This is from Mr. Tubbs to you: Quote.  
10 Even though we've -- haven't had any hard intel so  
11 far to make us believe there was going to be  
12 violence, I think we all assumed there would be,  
13 paren, and maybe even hoped for it, close paren.

14 A Well, that was -- those are Mr. Tubbs's  
15 words.

16 Q That's all right.

17 A I can't -- I can't speak for him or he  
18 can't speak for anybody else.

19 Q So --

20 A So, I don't -- I don't think that --  
21 that --

22 Q Would you -- it wasn't -- you've known  
23 Mr. Tubbs for a long time, correct?

24 A Approximately 20 years.

25 Q And you involved him as your chief of

1 J.M. HILL

2 staff, correct?

3 A Correct.

4 Q And you know that he -- he enjoys a  
5 violent encounter; isn't that right?

6 A I don't know that.

7 Q You don't know that?

8 A No, I don't know that. He's never told  
9 me he enjoys a violent encounter.

10 Q Well, when you saw this e-mail from him,  
11 were you concerned that he, perhaps, was looking  
12 forward to a violent encounter with Antifa?

13 A No, I don't think he was. I think he was  
14 merely referring to maybe some of the chatter that  
15 was going on around this, maybe, you know, from --

16 Q He isn't --

17 A -- but I don't think -- I know him well  
18 enough. He's a responsible man and he's not going to  
19 do anything to jeopardize the League or our event at  
20 Charlottesville. I know that.

21 He was simply -- and, again, I can't  
22 speak for him. He can speak for himself.

23 Q Didn't you post on your Facebook a call  
24 for whites to fight with the Antifa and the Black  
25 Lives Matter?

1 J.M. HILL

2 A I don't have access to that Facebook  
3 anymore and I -- I can't remember what I posted on  
4 there, to tell you the truth.

5 Q So it's your testimony that you didn't  
6 understand that Mr. Tubbs was looking forward to  
7 engaging the Black Lives Matter people in violence if  
8 the opportunity arose?

9 A No, Mr. Tubbs never said anything of the  
10 sort to me, that he was looking forward to violence.

11 Q And you don't think, from any of his  
12 prior relationships or contacts or conduct, that he  
13 would be inclined to do that; is that your testimony?

14 A Yeah, I have -- I have no reason to  
15 believe, and that's something you need to ask him and  
16 not me. That's a very personal thing, but from my  
17 perspective, no, he gave me no indication.

18 Q Well, in fact, isn't -- isn't it true  
19 that engaging in violence with The Black Lives Matter  
20 supporters would be in furtherance of the League of  
21 the South mission?

22 A No, it is not true.

23 Q Because, isn't it a fact that would  
24 demonstrate to them the commitment of League of the  
25 South to prevail?

1 J.M. HILL

2 A No. I'd say unequivocally no to that.

3 (Hill Deposition Exhibit No. 25 was  
4 marked for the record.)

5 BY MR. LEVINE:

6 Q Let's look at Exhibit 25. This is -- I'm  
7 going to show you a post the following day. I  
8 believe it's from you.

9 Take a look at this exhibit and read it?

10 A Okay. All right. You need to move it up  
11 the screen a little bit, please.

12 Okay. I see it.

13 Okay.

14 Q Isn't it a fact that when you heard that  
15 news from Mr. Kessler the day before, that you,  
16 yourself, got a little worked up about planning for a  
17 violent encounter?

18 A No. Not at all.

19 Q Not at all?

20 A Not at all.

21 Q And yet you posted the following day this  
22 piece, Fight or Die White Man?

23 A Oh, yes, I did. I did.

24 Q And you -- you agree with me that this is  
25 a call to action to fight in the tradition of your

1 J.M. HILL

2 honorable and courageous forebears?

3 A Well, how are you defining the word  
4 fight?

5 Q You used the word, Mr. Hill. Not me.

6 A I know. Okay. My definition of fight,  
7 sir, is to go into a contest, whether it be a  
8 political contest, a sporting contest, any sort of  
9 contest where people are at odds with one another,  
10 and to put your best efforts forward to win.

11 Fighting, as you know, sir, can be other  
12 than physical. We have never had the case of  
13 physical violence except in defense of ourselves, and  
14 I think that's pretty obvious from the things that  
15 we've brought up on the screen this morning.

16 The term fight here is a generic term and  
17 it means to struggle in pursuit of a worthy goal and  
18 that's the way I intended it.

19 Q But the e-mail, the prior day, was all  
20 about physical violence with the Antifa and Black  
21 Lives Matter group, right?

22 A Yes, we were concerned about the danger  
23 to our people from these people, but there is --  
24 there is --

25 Q You weren't -- this wasn't -- you weren't

1 J.M. HILL

2 going to Charlottesville for a football game; is that  
3 right?

4 A No, we were going to Charlottesville to  
5 defend our cultural heritage and to participate in a  
6 permitted rally, at which I had been asked to speak.

7 Q You were going for a political rally;  
8 isn't that right?

9 A We were going -- we were going for a  
10 political rally, exactly. And two sides, obviously,  
11 the Democrats and republicans for an example, fight  
12 it out every four years for the presidency. Nobody  
13 misinterprets that terminology of fight, so --

14 Q But Mr. Tubbs, the day before, clearly  
15 used the reference to violence and hoping for  
16 violence; isn't that right?

17 A He used the term violence. I don't  
18 think -- and, again, I can't speak for Mr. Tubbs.  
19 You need to question him about that. The violence  
20 that I was concerned about was violence against us  
21 from Antifa and Black Lives Matter, and it manifested  
22 itself.

23 Q And you wanted to be ready for that  
24 possibility of violence, right?

25 A We wanted our people to be ready to

1 J.M. HILL

2 defend themselves and to protect themselves from  
3 harm.

4 Q And doesn't -- there's nothing about self  
5 defense in your Facebook post on July 9th, is it? Is  
6 there?

7 A Is this the one that's on the screen  
8 right now?

9 Q Yes. There's nothing in here about self  
10 defense, is there?

11 A This has nothing to do with  
12 Charlottesville or the post the day before. This is  
13 a free-standing piece and it has nothing to do with  
14 anything, you know, having to do with  
15 Charlottesville. There's no link between the two.  
16 This is a generic piece, a more philosophical type  
17 piece.

18 Q That just happened to be coming out  
19 during the time that you're marketing and promoting  
20 attending the event at Charlottesville?

21 A Yes, it just happened to come out at that  
22 time.

23 Q Now, you -- you said that you then  
24 arranged -- hold on. Let's just -- let's look at --  
25 let's mark Exhibit 26.



1 J.M. HILL

2 (Hill Deposition Exhibit No. 26 was  
3 marked for the record.)

4 BY MR. LEVINE:

5 Q Take a look at this, which is back in  
6 April, an e-mail from you to Mr. Tubbs and others,  
7 correct?

8 A Yes, correct.

9 Q It says: Ray Owens reported to me that  
10 one of our own, Ryan King, was the one who bloodied  
11 the big Antifa jerk last night at Auburn. Ryan was  
12 arrested and released by the Auburn P.D. I spoke  
13 with Ryan this morning and extended to him hearty  
14 congratulations on behalf of all LS members for his  
15 actions.

16 Correct?

17 A Correct.

18 Q Did you -- did you learn in that  
19 conversation with Ryan King that his -- that must  
20 have been a physical fight, right?

21 A It was a physical fight. He was on his  
22 way in and he was attacked and defended himself.

23 Q So it's your -- the account that you  
24 heard was that it was all in self defense?

25 A Yes, that's exactly what I heard.

1 J.M. HILL

2 Q And yet he was arrested?

3 A Yes, he was.

4 Q And you congratulated him for doing --  
5 for beating up the Antifa jerk?

6 A I certainly did and I would do it again.  
7 I've congratulated him for defending himself, as any  
8 man would.

9 Q Now, when you -- you went ahead and  
10 ordered shields to be made, correct?

11 A That's correct.

12 Q And why did you only have 12 shields  
13 made?

14 A I did not specify a number. The  
15 gentleman who made them said that that was all he had  
16 the time and equipment to make, so that's what we  
17 took.

18 Q And how did you intend to use them?  
19 Withdrawn.

20 A For defense.

21 Q Excuse me, sir. Let me rephrase.

22 A Okay.

23 Q How did you intend them to be used?

24 A As defensive accouterments. I had  
25 watched some video, particularly from Antifa and

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Black Lives Matter violence on the West Coast, and I noticed that they threw a lot of objects, including some that looked fairly heavy and dangerous. And I knew that we would need some shields on the front line to block these sorts of things from being thrown at our people.

And as it turned out, many of those shields, in the aftermath of Charlottesville, were -- were nicked and bruised and had all kinds of discolorations on them from things that were thrown at us. And so my -- my summation -- my surmising of this was correct.

But we knew that we were going to be facing violence from Antifa and Black Lives Matter, and we prepared for it as best we could and we thought shields would be a very practical thing to have on the front line.

Q Now, you know or you knew at the time, didn't you, that shields of the kind that you were having manufactured or built could be used offensively, as well as defensively, right?

A You can use a helmet offensively if you take it off your head and hit somebody with it, but that's not the purpose of it. Anything can be used

1 J.M. HILL

2 violently like that. Our goal was to have defensive  
3 accouterments to protect ourselves.

4 Q I'm asking you, Mr. Hill -- you just  
5 answered me about a helmet. I'm not asking you about  
6 a helmet. I'm asking you about the shields.

7 You understood that the shields could be  
8 used as a pounding instrument, a battering  
9 instrument; isn't that right?

10 A Yes, I know what a shield is, sir, and I  
11 know what a shield can be used for. It can be used  
12 for a number of different things. A person,  
13 depending on his situation, could decide to use it  
14 for a number of things.

15 Q And --

16 A But the main -- the main -- when one  
17 thinks of a shield, sir, one mainly thinks of a  
18 defensive accouterment.

19 Q Did you expect that the shields could be  
20 used offensively, as well as defensively?

21 A No, I did not foresee any need we would  
22 have, beforehand, for using shields in an offensive  
23 manner.

24 Q Did you come to see that the shields were  
25 used offensively?

1 J.M. HILL

2 A No. I came to see, for most of the  
3 day -- and I must admit that I was not everywhere all  
4 at once in the streets of Charlottesville on  
5 Saturday, the 12th of August.

6 But from my own personal observation,  
7 sir, I saw the shields being used to protect innocent  
8 people from being assaulted and hit by thrown  
9 objects.

10 Q Didn't you -- you were marching with  
11 Mr. Tubbs in the very beginning of the afternoon down  
12 McIntire Street, correct?

13 A Yes, that's exactly right.

14 Q And did you see -- weren't you physically  
15 there when Mr. Tubbs led the group, including the men  
16 with the shields, into the protesters, pushing them,  
17 using the shields to barricade and barrel through the  
18 protesters offensively? Didn't you see that?

19 A I saw certain individuals defending  
20 themselves with the shields from people who were  
21 trying to assault them with various kinds of weapons  
22 --

23 Q I'm asking you --

24 A -- in this melee. I'm trying to answer  
25 you, sir.

1 J.M. HILL

2 -- in this melee and I was hit in the  
3 side of the head and distracted for some time. I did  
4 not see everything that went on. And, to be quite  
5 honest, when you're in the middle of a heated  
6 situation like that, it's very difficult to remember  
7 exactly everything you saw.

8 So I saw -- I saw our people using their  
9 shields mainly to defend themselves.

10 Q Isn't it a fact, Mr. Hill, that you,  
11 along with Mr. Heimbach, walked behind Mr. Tubbs and  
12 League of the South members with the shields down  
13 McIntire Street towards the park?

14 A Not behind. Mr. Tubbs and I, with  
15 Mr. Heimbach off to our right, walked in front of the  
16 men with the shields.

17 Q And did you -- at the time, the men with  
18 the shields, the League of the South men with the  
19 shields made the first contact with the protesters  
20 from Black Lives Matter and others. They walked up  
21 to them, into them and through them to get to the  
22 park. Isn't that right?

23 A Yes, we did. We walked up to them and we  
24 went through them to get to the park.

25 Q And isn't it a fact that in order to get

1 J.M. HILL

2 through them, the League of the South people used  
3 their shields to push the protesters away?

4 A I did not see, that day, any particular  
5 examples of that. I do not doubt that it may have  
6 happened, but I didn't see any particular examples of  
7 it because I was engaged to the right-hand side of  
8 that column when someone attacked me. So I know the  
9 video. I can go back and see the video, just like  
10 you can.

11 But yes, we -- we went through this group  
12 to the park, and I don't know exactly what they did  
13 with the shields.

14 Q And one of the ways, physically, that the  
15 group got through the park was using the shields to  
16 push the counter-protesters away -- pushed them to  
17 the ground and pushed them away; isn't that right?

18 A I did not -- I did not see anybody being  
19 pushed to the ground. I did see some people -- I did  
20 see some people pushing, pushing up against our  
21 people, but I don't know who initiated the contact,  
22 sir.

23 Q Isn't it a fact, Mr. Hill, that the  
24 contact was initiated by Mr. Tubbs and the League of  
25 the South people with the shields literally walking

1 J.M. HILL

2 into the protesters?

3 A We walked into the protesters, and from  
4 what happened from that point on it was a lot of  
5 confusion and all I can tell you is what I personally  
6 saw, sir and what video has shown me since then.

7 Q And what happened after was a melee that  
8 included violence of one side against the other  
9 correct?

10 A There was violence all over the place  
11 that day, sir. And as I said, I saw some things and  
12 there was much I didn't see because I was preoccupied  
13 with defending myself.

14 Q I'm asking you, Mr. Hill, isn't it a fact  
15 that the initial violence, the initial physical  
16 confrontation, took place when Mr. Tubbs led the  
17 League of the South members and the shields, the men  
18 with the shields, into the protesters who were  
19 standing near the entrance to the park on McIntire  
20 Street.

21 A Sir, when you say violence, please, for  
22 me, define the term in this context.

23 Q I'm -- there was a physical pushing and  
24 shoving of the League of the South people against the  
25 protesters to push and clear them from the street;



1 J.M. HILL

2 isn't that right?

3 A Yes, that is right, sir, after --

4 after --

5 Q Okay. And that led -- and that led to  
6 fighting between both sides, correct?

7 A Something led to fighting between both  
8 sides.

9 Q Well, if --

10 A Our men went through after things were --

11 Q Mr. --

12 A The initial violence, sir, was things  
13 being thrown at us, dangerous objects.

14 Q Put aside -- put aside what happened  
15 after League of the South men with shields walked  
16 into the protesters.

17 If Mr. Tubbs, when he saw -- and you --  
18 saw the protesters on McIntire Street some 30 or 40  
19 yards away, and you turned around and went a  
20 different place into the park, there wouldn't have  
21 been that violent confrontation that took place;  
22 isn't that right?

23 A I have no idea, sir. I have -- I can't  
24 predict what didn't -- I can't tell you what didn't  
25 happen, sir.

1 J.M. HILL

2 Q Well, what happened, the violence that  
3 took place was precipitated by the League of the  
4 South men with their shields walking into those  
5 protesters; isn't so that right?

6 A No, it isn't, sir, it's the exact  
7 opposite.

8 Q You want to tell me --

9 A It was initiated by people throwing  
10 things at us and refusing to get out of our way so we  
11 could get to the park.

12 Q You didn't have a permit for the street,  
13 did you?

14 A It was an open thoroughfare, sir. It was  
15 an open thoroughfare, open to foot traffic.

16 Q It was a public street, correct?

17 A Yes, it's a public street, sir, and we  
18 had as much right to be on it as anybody.

19 Q And do you consider walking into those  
20 people with shields to push them out of the way an  
21 act of self defense?

22 A It's an act, sir, of getting from point A  
23 to point B on a --

24 Q I'm asking you -- I'm asking you,  
25 Mr. Hill.

1 J.M. HILL

2 MR. JONES: Stop interrupting him,  
3 sir. He could answer the question.

4 BY MR. LEVINE:

5 Q I'm asking you, Mr. Hill, what about that  
6 act is self defense at life, liberty and property.

7 A We had a right to be on that street, sir.  
8 It was open to foot traffic. I looked over at a  
9 policeman to my left to say, how do we get through  
10 here. Can we get through here peacefully. He  
11 shrugged his shoulders and said, basically, you are  
12 on your own.

13 At that point, you talk about liberty,  
14 sir, you mentioned life, liberty and property,  
15 liberty involves your rights, your First Amendment  
16 rights to freedom of assembly and freedom of speech  
17 and we were going into that park to exercise those  
18 rights. If that mob had not been in front of us, we  
19 would have been there peacefully.

20 They locked arms, sir, started throwing  
21 things at us, cursing us. And at that point, we  
22 could turnaround and just say, okay, we don't have  
23 any rights, or we could go through them to the park  
24 and exercise our rights, and I made the decision to  
25 do the latter.

1 J.M. HILL

2 Q But you could have also found a different  
3 street to get into the park; isn't that right?

4 A No, sir, we could not have. Everything  
5 was so crowded, we could not know -- we were not from  
6 the area and this is the only route in we had  
7 planned. And, basically, the cops had everything  
8 else blocked off.

9 Q And so it's your testimony that the way  
10 you proceeded, unilaterally moving into the  
11 protesters with the shields, was an act of self  
12 defense for --

13 A It was an act of self defense for our  
14 liberty to exercise our First Amendment rights.

15 Q Now, were you carrying a gun that day?

16 A I was, sir. I was carrying a Glock 45.

17 Q And was there a discussion about the use  
18 of weapons on that day, before the events took place?

19 A There was a discussion on the previous  
20 night. We've already discussed the meeting we had on  
21 Friday night, the 11th. We went over the ground  
22 rules for everything that night. And that morning, I  
23 briefed everybody before we left our -- the place we  
24 stayed there, again, about not using any weapons at  
25 all, except in self defense of your own life or

1 J.M. HILL

2 someone else's.

3 So, yes, we -- we talked to our members  
4 about this.

5 Q And I want to show you an e-mail from  
6 July 7, 2017, which I believe you were on.

7 (Hill Deposition Exhibit No. 27 was  
8 marked for the record.)

9 BY MR. LEVINE:

10 Q I'm showing you an exhibit that we will  
11 mark as Exhibit 27.

12 Would you please look at it?

13 A Yeah, I'm looking at it.

14 Q And scroll down, too.

15 A Okay. It keeps jumping around on the  
16 screen. I'm not sure what I really need to be  
17 reading.

18 Q Is this -- this is, I think, the Kessler  
19 e-mail that you looked at before?

20 A The one where he was warning about the  
21 Antifa from the meeting in DC. Yes, I saw that  
22 before, yes.

23 Q And you see your response from  
24 Mr. Thomey?

25 A Yes, I'm reading it right now.

1 J.M. HILL

2 Q Do you see Mr. Thomey says: We need to  
3 surveil the area, map out staging points for vehicles  
4 and equipment, and establish escape routes and plans  
5 and send along a code word which let's our folks know  
6 to unleash hell -- to unleash hell on them.

7 A Right. Yeah, I see that. I see that.

8 Q So were there any other plans, escape  
9 routes or plans, for getting to the park?

10 A No, we basically had one plan and I -- I  
11 subsequently have seen the error of that, but at the  
12 time, I wasn't expecting what happened to happen.  
13 And we weren't able -- we weren't able to execute our  
14 original plan because of what happened in the park.  
15 I mean, we got scattered all over the place.

16 Q And Thomey -- there's a reference here to  
17 settle on a code word.

18 A That was from Mr. Thomey, this was his  
19 own personal views, this was not a part of our  
20 established plan. He is simply making suggestions  
21 here, and I can't speak for him.

22 Q Isn't it a fact that right at or about  
23 this time, that people from League of the South did  
24 surveillance on the area?

25 A I am not sure. I would have to talk to

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2 Mr. Baker about that since I put him in charge of our  
3 plan for entering and exiting the area. I would -- I  
4 would have to talk to him to see if he appointed  
5 anybody to -- to go and do any surveillance as early  
6 as July. I don't know.

7 I know that I -- I don't remember doing  
8 it myself or appointing anybody.

9 Q Do you remember, at your direction,  
10 surveillance of the area was done and you received  
11 kind of Google map pictures of the streets around the  
12 park?

13 A Yes, I do remember that. I asked the  
14 late Tommy Malone, who at the time was our security  
15 man, if he would check out some aerial photographs of  
16 the area so we could look at potential escape routes  
17 and things if they were needed.

18 And, yes, I do remember seeing some of  
19 those, but -- but those were basically -- those  
20 basically were, I think, like Google -- Google  
21 Maps -- I don't -- we didn't actually send anybody in  
22 there, to my knowledge, to do the surveillance. He  
23 used what was available on-line from Google, I  
24 believe, so yes, I do remember those.

25 Q And there were pictures of all of the

1 J.M. HILL

2 different egresses and ingresses to the park?

3 A That's correct, yes. That's correct,  
4 yes.

5 Q So you actually were -- I can show you  
6 Exhibit 28.

7 (Hill Deposition Exhibit No. 28 was  
8 marked for the record.)

9 BY MR. LEVINE:

10 Q You actually did get rather extensive  
11 photos of the neighborhood around the park --

12 A Yes, we did.

13 Q -- and of all of the different streets  
14 that you could go to and from the park?

15 A Yes, we did get those, but what you see  
16 from Google Maps taken on who knows what kind of day,  
17 where nobody's out. All those things were very  
18 obscured when you've got thousands and thousands of  
19 people on the ground and it becomes less than easy to  
20 remember.

21 And obviously, you know, you look at  
22 those one or two times -- it's not like you've  
23 actually walked the ground. So it's not like it's --  
24 you know, you're in your own town and you know the  
25 place, as they say, like the proverbial back of your



1 J.M. HILL

2 hand.

3 Q Why don't you -- Mr. Hill, why don't you  
4 look at the surveillance pictures that were provided  
5 to you.

6 A Yes, I'm looking at them.

7 Q They show a number of different --  
8 they're actually specifically identified as Approach  
9 to the Statue from various corners of the park.

10 A Oh, yes. Sir, on that day, the -- I  
11 think it was the Virginia State Police, had what I  
12 believe is the northern half of the park occupied and  
13 you -- nobody was going through that area.

14 So we're talking about dealing with the  
15 southeast and southwest entrances to the park, sir,  
16 and there was a huge mob of Antifa and Black Lives  
17 Matter separating the southeastern entrance from the  
18 southwestern entrance. And all the cops had the  
19 northeast and northwest entrances blocked off. We  
20 had no other way of getting in.

21 Q That was your testimony, that on that day  
22 there was only one way to get into the park?

23 A Sir, from our observations, the northern  
24 entries to the park, northeast and northwest, were  
25 blocked by police barricades and policeman,

1 J.M. HILL

2 Charlottesville policeman, Virginia State Police, et  
3 cetera. The --

4 Q The --

5 A The other entrance, the southwest  
6 entrance may have been open officially, but there was  
7 no way for us to get there except through the mob of  
8 Antifa. So we went in the southeast entrance, which  
9 is what we had planned to go in all along, and what  
10 Mr. Baker had actually told the Charlottesville  
11 Police Department that we were going to do. So --

12 Q Isn't it a fact that when Mr. Tubbs and  
13 you looked down the street on McIntire Street and saw  
14 the protesters 30, 40 yards away, that there wasn't a  
15 second thought on your part about finding an  
16 alternative route into the park?

17 A I did not seek an alternative route into  
18 the park, sir. When we got about 30 feet away from  
19 that mass of protesters, I stopped and gave them a  
20 chance to part their ranks where we could walk  
21 through there without any trouble, and they refused.

22 At that time, we had a column of about  
23 four to 500 people, sir, and the logistics of turning  
24 that column around and trying to find our way to some  
25 other entrance in the park -- and it would have been

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2 the same on the western side, too, sir, because all  
3 of the people who came from McIntire Park into Lee  
4 Park were pelted with all kinds of debris from Antifa  
5 and Black Lives Matter, and some were assaulted.

6 Either way --

7 Q Mr. Hill. Mr. Hill. I asked you a  
8 question.

9 A And I'm answering it, sir.

10 Q You're making a speech.

11 The fact is that you didn't think, for a  
12 minute, about an alternative way? You were going up  
13 that street, into the park, through those protesters,  
14 whatever the consequences would be; isn't that right?

15 A Sir, we were -- we had one way into the  
16 park. We were not local. We did not know all the  
17 routes.

18 I'm speaking here in retrospect. After  
19 the fact, I learned all of this stuff I've just told  
20 you about all the entrances. That, to us, was the  
21 only entrance that was available to us because of  
22 where we were located, where we started and where we  
23 knew that we had to enter the park.

24 We did not know the ground like locals.  
25 So we were doing -- I guess you could say we were

1 J.M. HILL

2 doing the best we could under very trying  
3 circumstances.

4 Q So let me just go back to -- to Friday  
5 night.

6 Did you learn Friday night, late, that  
7 Mr. Griffin had gone to the rally, to the torch light  
8 rally?

9 A I can't remember, sir. I can't remember.  
10 There was so much going on that night that it's --  
11 it's all kind of a blur. And, you know, it's been  
12 virtually -- almost three years ago and a lot was  
13 going on. I don't remember.

14 Q Did you learn Friday night from any one  
15 of your -- the observers that you sent what happened  
16 Friday night?

17 A I don't recall, sir. I don't recall  
18 when -- when I actually learned what happened on the  
19 torch light -- torch light parade there.

20 Q When did you -- withdrawn.

21 What were the names of the observers that  
22 you sent?

23 A Sir, I can't remember. Everything, as I  
24 said, was a blur. I don't even actually remember  
25 sending them. I guess I did because I mentioned

1 J.M. HILL

2 something about it. But, I mean, I was being -- as  
3 the leader of the group, I was being pulled in about  
4 ten directions at once, trying to get everything  
5 done, and there's simply things I do not remember.

6 Q So when do you remember learning of the  
7 events of Friday night?

8 A I don't know. Maybe when I got home to  
9 my office on late Sunday night -- that would have  
10 been the 13th -- or certainly by Monday morning, the  
11 14th. I was on the internet and social media, and I  
12 think then I probably -- and I can't give you a  
13 pinpointed time, sir, but I imagine that it probably  
14 was two or three days -- within two or three days  
15 after I returned home from Charlottesville.

16 Q So you didn't learn -- it's your  
17 testimony you didn't learn Friday night about the  
18 rally --

19 A I don't -- sir, my testimony is I don't  
20 remember learning anything about it while I was in  
21 Charlottesville. You know, the -- and what I'm  
22 saying is not the actual -- that the event was  
23 happening, but what I understood you to say was the  
24 outcome of it, what actually transpired.

25 Q And what was the outcome, as you

1 J.M. HILL

2 understood?

3 A Well, you know, I saw the video, and I  
4 know there was some -- some conflict and probably a  
5 few fights and things like that. So I didn't know  
6 all -- about all those details, as far as I remember,  
7 until I got home and started looking at things on my  
8 computer screen.

9 Q Do you remember listening to the podcast  
10 earlier about Friday night?

11 A Yes, I remember the podcast, yes.

12 Q Let's -- let's replay Exhibit -- I'm not  
13 sure. I think we marked this already. I'm going to  
14 play Exhibit 18, which was marked earlier this  
15 morning.

16 VIDEO EXHIBIT PLAYED: (Are you  
17 expecting to do any torch lit  
18 demonstrations, marches? There's been  
19 some successful ones in 2017.

20 Oh, yes, absolutely. I'm not going  
21 to let the cat out of the bag about where  
22 and when those might be, but I will say  
23 it's definitely yes. If you come to a  
24 big event, the optics of those are just  
25 too good to pass up.

1 J.M. HILL

2 So if you come to a League event,  
3 just bring your tiki torch, just in case.

4 Yeah, and we may -- we may go old  
5 school with some of these torches. We  
6 may actually make some true flambeaux,  
7 you know, something with -- some pine tar  
8 torches.

9 Yeah, exactly.

10 And, you know, go -- go medieval,  
11 as you might -- might say, with these  
12 things. That would be fun. But yeah,  
13 that's in the plans, Harold, I'm proud to  
14 say. Good optics. Good optics.

15 It sure did look good having all  
16 those hundreds of men and a few women  
17 marching there in Charlottesville on  
18 August the 12th.

19 Yes, it did. That was very  
20 impressive, very impressive. And we want  
21 to see if maybe we can beat that.)

22 BY MR. LEVINE:

23 Q Do you -- did you hear that, sir?

24 A Yes, I did.

25 Q Do you remember saying, in reference to

1 J.M. HILL

2 the Charlottesville torch light rally, that the  
3 optics of those are too good to pass up?

4 A I remember saying it that night and I  
5 think you said that was, what, in January of 2018?

6 Q Correct.

7 A Yes. Yeah, I remember saying that, and  
8 we actually -- yeah, I do remember that, yes.

9 Q And what's -- what is it about the optics  
10 that are so good about that rally, sir?

11 A Well, I don't know. It just -- it just  
12 appealed to me. That's all I can say. It's probably  
13 a very subjective thing, sir, but it just appealed to  
14 me. It was just very ordered and it was just  
15 striking.

16 Q And one of the very significant parts of  
17 the torch light rally were the chanting in unison;  
18 isn't that right?

19 A Yeah, I heard that, and that turned out  
20 to be a big part of that particular event.

21 Q And when your -- and the chants included  
22 three basic chants, as I recall, listening to it.  
23 One was Jews Will Not Replace Us; one was You Will  
24 Not Replace Us and one was Blood And Soil.

25 Do you remember those three chants?



1 J.M. HILL

2 A Well, I don't remember them because I  
3 wasn't there, but I do remember seeing them in the  
4 video -- or hearing them in the videos I've watched.

5 Q And those chants are directed, among  
6 others, at Jews; isn't that right?

7 A I would suspect. And obviously, you  
8 know, not having been a participant in this and not  
9 been an organizer, I don't know what the intent of  
10 that was, but -- so I guess I just plead ignorance.

11 Q What about -- do you connect the torch  
12 light with the KKK torch light marches? Is that part  
13 of the optics that are good?

14 A No. I really never have quite connected  
15 the two, those two things. I know that -- that --  
16 that was done a tactic by the KKK years and years  
17 ago, but no, I've never really connected the two.

18 Q But you appreciate that people in the  
19 public could associate those torch light -- a torch  
20 light rally like that with the KKK; isn't that right?

21 A Yes, I could see where, if they knew  
22 their history, they might be able to associate the  
23 two.

24 Q Particularly in the south; is that right?

25 A Particularly in the south, yes.

1 J.M. HILL

2 Q And is the optics -- what about a torch  
3 light rally like that, chanting Jews Will Not Replace  
4 Us and Blood and Soil, which is a Nazi slogan, what  
5 is that about the optics that are so attractive to  
6 you?

7 A Well, when I used the term optics, sir,  
8 I'm using it in a very precise way that means what  
9 you see. The optics of this, of the men, the young  
10 men mainly, dressed in nice attire, marching in order  
11 with the torches, it was very appealing. I wouldn't  
12 mind doing something like that in the future with the  
13 League, if we could.

14 I don't know what the focus of it might  
15 be, but I do think it's rather attractive.

16 Q So men dressed in -- they were all  
17 dressed in the same uniform, correct?

18 A I don't know, sir. I wasn't there. All  
19 I can go by is the video. They seemed to have --

20 Q Won't the video show that they were in  
21 khakis and white shirts?

22 A A lot of them were. I don't know if that  
23 was uniform throughout the crowd, but a lot of them  
24 were.

25 Q And would you agree with me that, if you

1 J.M. HILL

2 were a Jewish person on the University of Virginia  
3 campus that night, that that march might be a scary  
4 thing to you?

5 A Sir, I cannot put myself in someone  
6 else's mind. I don't know. It would be -- it would  
7 be foolish for me to even try.

8 Q Well, you're a historian; isn't that  
9 right?

10 A Yes, I was at one time.

11 Q You have a doctorate in British history,  
12 you said; is that right?

13 A I do, yes, that's right.

14 Q So you studied people's conduct and  
15 behavior for your whole life; isn't that right?

16 A I would say that's probably a true  
17 statement.

18 Q And if you -- and if you studied British  
19 history, you were a student of wars and civil wars  
20 within the British Isles; is that right?

21 A That is correct, sir.

22 Q So is it -- I'm asking you, isn't it a  
23 fact, based on your human experience, that a Jewish  
24 person standing on the sidelines on the University of  
25 Virginia campus that night, watching hundreds of men

J.M. HILL

in uniform with torches chanting Jews Will Not Replace Us and Blood And Soil, could be intimidated by that, could be scared by that?

A In a purely theoretical way, sir, I could see where that might be the case, but I'm just speculating because, A, I was not there and, B, I'm not a Jewish person.

Q You're not really speculating. You're using your life's experience to say that being a Jewish person on the sideline there at the University of Virginia campus while hundreds of men dressed in a uniform walked by with torches chanting a Nazi slogan could be intimidating; isn't that right?

MR. JONES: I'm going to object to the form. Go ahead, sir.

THE WITNESS: Well, sir, you're wanting me to speculate about how a person who is not me would feel about something, and I just don't feel comfortable doing that.

I know what you're getting at, but I don't feel comfortable saying how I would feel if I were another person.

1 J.M. HILL

2 BY MR. LEVINE:

3 Q Mr. -- Mr. -- Mr. Hill, the Federal Rules  
4 of Civil Procedure, and Evidence, actually permit an  
5 ordinary person to give his opinion about conduct  
6 that's taken place that they have seen.

7 And you've watched those videos and you  
8 were a participant in the Unite the Right rally, and  
9 I'm asking you: Isn't it a fact that you can  
10 understand a Jewish person --

11 MR. JONES: I'm going to object as  
12 asked and answered. This is the third  
13 time.

14 MR. LEVINE: I'm going to finish my  
15 question, please. You can object at the  
16 end and the objection will be dealt with  
17 at trial. Please let me get my question  
18 out.

19 BY MR. LEVINE:

20 Q Simply, I'm asking you, if you were a  
21 Jewish person sitting on the University of Virginia  
22 campus, watching hundreds of protesters go by with  
23 khaki and white shirt uniforms and flaming torches,  
24 shouting Nazi slogans, would it be fair for a Jewish  
25 person seeing that to be physically intimidated?

J.M. HILL

A Sir, you're asking me a question that I can't answer because I am not a Jewish person in that position. I do not know what they might think. I do not have that life experience.

All I can do is speculate about something like that, and I think that at this point that's worthless.

Q One of the things that -- you've said that the optics of it are too good to pass up. And the optics of it were the white nationalist demonstration of that kind; isn't that right?

A In general, yes, it is. And I'm -- I was very attracted by the look of the flames in the night, and it just really -- it just really looked good. And that's a personal subjective opinion of mine.

We have since backed off of that in the League. We didn't have one of those, but I considered it.

Q But in finding it attractive from a white nationalist perspective, besides the KKK using it, similar white nationalist perspective, what other -- what other experience was -- was brought to your mind?

1 J.M. HILL

2 A I don't think that there was one. I just  
3 --

4 Q Besides KKK?

5 A I saw this. As I said, when I got back  
6 from Charlottesville, I saw the video and the video  
7 looked -- looked, you know, very orderly and  
8 disciplined, and it just looked like a nice thing to  
9 do to bring people together and give your people a  
10 nice little event, exercise their First Amendment  
11 rights.

12 It didn't remind me of anything. I  
13 hadn't -- I hadn't seen anything like it before.

14 Q What time did you leave your campgrounds  
15 in Virginia on the morning of -- on Saturday morning?

16 A This would be a guess, but I am thinking  
17 somewhere between six and seven o'clock in the  
18 morning.

19 Q And where did you drive to?

20 A Well, I can't remember the exact name of  
21 the place, but I do think I can identify it by a  
22 couple of stores. I believe it was right outside of  
23 the city limits of Charlottesville. And we stayed --  
24 if my directions are right -- to the northwest of the  
25 city.

1 J.M. HILL

2 So we came -- we came down to a parking  
3 lot that had a Walmart and a JoAnne's Fabrics. I  
4 don't -- I can't name the place, but it was right  
5 outside, I believe, the city limits of  
6 Charlottesville. And that was the place that  
7 everyone was going to meet and we were going to form  
8 up a convoy and drive from there to the parking  
9 garage on East Market Street in Charlottesville.

10 Q And did you end up meeting at the top of  
11 the garage?

12 A I think people parked on all levels of  
13 the garage. I think -- as best I can remember, we  
14 parked on the top level because we wanted to go to  
15 the top and then let people behind us still in the  
16 bottom levels. So I think people parked on all  
17 levels of the parking garage.

18 Q But then I asked you, sir, did you end up  
19 meeting at the top of the garage?

20 A No, I actually -- I actually think that  
21 we met on the floor next to the top, to put our  
22 people in line and get them ordered up so we could go  
23 out and go down East Market Street to the park. So I  
24 think it was the floor below the top floor.

25 Q And did the group do anything else



1 J.M. HILL

2 besides congregate in the garage and then start to  
3 march out?

4 A Well, I don't -- I don't think so. I  
5 mean, people talked and people sang and people  
6 chanted and did all kinds of things, visited with one  
7 another.

8 We actually had a hard time getting  
9 people to talk with each other. A lot of people  
10 hadn't seen each other in a long time. It was kind  
11 of a social gathering, you know.

12 Q And what were the chants?

13 A I really don't remember, sir. I was so  
14 intent on getting everybody lined up and getting  
15 everybody -- I don't remember the chants, at all. I  
16 don't.

17 Q You then ended up marching to the park,  
18 correct?

19 A That is correct, sir. We marched all the  
20 way from the parking garage on East Market Street,  
21 down East Market Street to the park, yes.

22 Q And when did you -- I've asked you  
23 questions about marching into the protesters and the  
24 melee that developed.

25 When did you physically leave that area

1 J.M. HILL

2 that day?

3 A I don't recall what time that it was  
4 declared to be an unlawful assembly. I don't -- I  
5 don't recall because of all the confusion. But at  
6 that time, when it was declared an unlawful assembly,  
7 I told as many people as I could reach in the  
8 confusion that we needed to get -- get out of there  
9 and get back to the parking garage.

10 I left the --

11 Q And after -- and did you do that?

12 A Yes. So -- but we ended up having to go  
13 in two different directions because of the police.  
14 They forced some of our people back to the east, back  
15 to the parking garage where we had originally parked.  
16 And some of us got forced out of the park to the  
17 west, and we ended up in McIntire Park.

18 So we -- all of our people got separated  
19 in the confusion when it was declared an unlawful  
20 assembly.

21 Q And where did you end up?

22 A I ended up in McIntire Park.

23 Q And after -- how long did you stay in  
24 McIntire Park?

25 A Sir, I can't -- in all the confusion, I

1 J.M. HILL

2 can't remember. I guess it probably was no more than  
3 an hour, and I found someone who was willing to drive  
4 me back from McIntire Park to the parking garage  
5 where I had originally come in earlier that morning.

6 Q And did anything go on -- was any part of  
7 the rally conducted at McIntire Park?

8 A Not that I saw. I can't speak for other  
9 groups or speakers or anything like that.

10 My purpose when I got to McIntire Park  
11 was rounding up all of our people who were there,  
12 making sure they were safe, and finding rides for  
13 them back to the parking garage on East Market  
14 Street.

15 Q And am I correct, sir, that the rally  
16 that was planned, the speaker's rally, never took  
17 place that day in the park?

18 A In Lee -- what was then known as Lee  
19 Park?

20 Q Correct.

21 A To my knowledge, sir, it was broken up  
22 probably 45 minutes to an hour before the speakers  
23 were scheduled. I'm guessing at that. But no, to my  
24 knowledge, nothing ever took place there except we  
25 got in the park and, you know, we had all kind of

1 J.M. HILL

2 things thrown at us, and then we got run out of the  
3 park. So --

4 Q And you never made your speech, I take  
5 it?

6 A No, sir, I did not.

7 Q That was going to be a highlight for you,  
8 wasn't it?

9 A It was. I was -- that's the main reason  
10 that I went. I -- I -- I'm a good speech maker. I  
11 enjoy giving speeches, sir.

12 Q Had you written your speech out?

13 A No, I had a few notes. I hadn't written  
14 a speech. I just had a few notes. It was not going  
15 to be long. It was only going to be about ten to 15  
16 minutes.

17 Q Had you ever spoken to a large group like  
18 that before?

19 A Oh, yes. I've spoken to several large  
20 groups.

21 Q In a public rally of that kind?

22 A Yes, I have.

23 Q And so you never spoke -- that never  
24 happened. And then unlawful assembly was declared,  
25 correct?

1 J.M. HILL

2 A Yes, to my knowledge, that's what  
3 happened. The governor, I think, declared an  
4 unlawful assembly and the Virginia State Police and  
5 the Charlottesville Police Department started driving  
6 everybody forcibly out of the park, so we had to  
7 leave.

8 Q So the sum total of that day was driving  
9 by convoy with your League of the South members to  
10 the garage, meeting up with the NSM and the TWP and  
11 others, marching on the streets of Charlottesville to  
12 the park, not physically getting into the park for  
13 the rally, no rally took place, no speeches were  
14 made, and then you found your way from the public --  
15 from that park to another park and then back to the  
16 campsite; is that right?

17 A That pretty much sums -- yes, sir, that  
18 sums it up.

19 Q Let's look at Tab 41. I'm sorry.  
20 Exhibit 29.

21 (Hill Deposition Exhibit No. 29 was  
22 marked for the record.)

23 BY MR. LEVINE:

24 Q Take a look at this video, please.

25 (Video exhibit played.)

1 J.M. HILL

2 BY MR. LEVINE:

3 Q So, Mr. Hill, do you recognize Mr. Tubbs  
4 at the beginning of -- in the front of the group in  
5 the beginning?

6 A I do. I do.

7 Q And the people with the khakis and black  
8 shirts, were the League of the South members,  
9 correct?

10 A If they had khakis, black shirts with  
11 League of the South emblem on it, they would be. I'm  
12 not saying that everybody there with a black shirt  
13 and khaki pants was a League member, but our members  
14 were in that attire, yes.

15 Q And that's the white flag with the League  
16 of the South emblem on it, correct?

17 A As best I can tell with what I'm looking  
18 at right now, to the left of Mr. Tubbs and slightly  
19 in front of him looks to be a League of the South  
20 flag that's furled.

21 Q And moving on just a little further.  
22 That's walking into the protesters the  
23 first time, correct?

24 A As far as I can tell, that is the initial  
25 contact right there.

1 J.M. HILL

2 Q Thank you.

3 And who -- right there, who is that  
4 League of the South person who jumped ahead of  
5 Mr. Tubbs?

6 A Sir, I can't -- sir, I don't know. I  
7 can't see his face. I don't know who may have come  
8 up out of the group at that time. I can't identify  
9 him from what I'm looking at right now.

10 Q Does -- do you know a man by the name of  
11 Spencer Borham?

12 A I do know a man by the name of Spencer  
13 Borham, yes.

14 Q Was he walking with Mr. Tubbs in the  
15 front?

16 A I am not sure exactly where Mr. Borham  
17 was. I know that when we left the parking garage,  
18 that he was -- Mr. Tubbs was to my immediate left and  
19 Mr. Borham was kind of walking up and down the line,  
20 making sure everybody was in order as we left the  
21 parking garage. So he would have been to Mr. Tubbs's  
22 left. But I can't see with this picture well enough  
23 to know if that's him or not.

24 Q Now, look at -- this is -- the League of  
25 the South people get separated from Mr. Tubbs and

1 J.M. HILL

2 some of them are behind, and I wanted you  
3 to identify -- I ask you if you could identify.

4 Are these people that were marching with  
5 League of the South, with the khakis and the black  
6 shirts?

7 A Okay. Let me do what I can here. The  
8 man in the middle, who has a helmet on with the black  
9 shirt and it looks like maybe gray pants and has his  
10 left hand extended, I do not believe that's a League  
11 of the South member.

12 Q That's Mr. Heimbach, isn't it?

13 A I can't tell, sir. It looks like he has  
14 a beard and I'm not sure that Mr. Heimbach had a  
15 beard at the time. I really don't know. But the  
16 man --

17 Q What about --

18 A The man to his immediate right with the  
19 Confederate flag on a pole, I do not recognize him.

20 The man to the left of the man that you  
21 thought might be Mr. Heimbach, he is obscured by --  
22 appears to be a woman in a white shirt, and I can't  
23 see his face, so I don't know if that's a League  
24 person or not. It looks like he has on a black shirt  
25 and, from what I can tell, the pants look khaki, but



1 J.M. HILL

2 I can't make out who that is.

3 Q Okay. Now, were those League of the  
4 South people with the League of the South flag?

5 A More than likely, unless somebody just  
6 handed one of those off to somebody who was not a  
7 league member. I would say the white -- it's a  
8 likelihood that if a person has a League flag in  
9 their hands, they probably are a League member, yes.

10 Q And does that person right there with the  
11 League flag have the League of the South emblem on  
12 the black shirt?

13 A Well, actually, I can't tell which person  
14 has the flag. There's a -- a person to the right  
15 that looks like he may be holding it. Has a tan cap  
16 on. I don't know. I don't know who that is. But  
17 there's a person that -- whose face is obscured by  
18 the flag who may be the actual flag bearer, I don't  
19 know.

20 Q And is that a picture of a number of men  
21 in khaki pants and the black shirt uniform with -- I  
22 see at least four flags that were being carried by  
23 League of the South, three black and white ones and  
24 one Confederate one.

25 A Yes, I see the Confederate one in the

1 J.M. HILL

2 middle right there, and that -- I'm not saying this  
3 for sure because, obviously, I can't see his face  
4 well. That may be Harold Crews.

5 Q Okay. Were you standing in this area  
6 (indicating)?

7 A Sir, I can't remember. As I said, it is  
8 all just a blur. I was hit in the right side of the  
9 head very early on in this and was somewhat stunned,  
10 and a lot of it is basically just kind of all jumbled  
11 up. I don't remember a lot of details in the chaos.

12 Q Let's go to another video near the same  
13 place. We'll mark this Exhibit 29 -- oh, we're going  
14 to mark it Exhibit 30.

15 (Hill Deposition Exhibit No. 30 was  
16 marked for the record.)

17 BY MR. LEVINE:

18 Q Take a look at what we're going to mark  
19 as Exhibit 30.

20 (Video Exhibit played.)

21 BY MR. LEVINE:

22 Q Is that -- I'll ask you first, is that  
23 Mr. Heimbach?

24 A Yes, that is Mr. Heimbach. And he does  
25 have a beard there, I didn't remember that.

1 J.M. HILL

2 Q And I'm going to ask you if that's you  
3 standing next to him? That's going to come into the  
4 picture.

5 A It does look like me, sir. I do not see  
6 my face, but it does look like me, and that's the  
7 position I was in. I was to Mr. Heimbach's left at  
8 the front of the column. So I do think that probably  
9 is me.

10 Q And the shields, are those the top of the  
11 shields?

12 A Yeah, as far as I know, immediately to my  
13 left there, that would have been a couple -- a couple  
14 of the men that I assigned to be -- to hold the  
15 shields.

16 Q Okay.

17 (Video exhibit played.)

18 BY MR. LEVINE:

19 So Mr. Hill --

20 A Yes.

21 Q -- you just -- is that you in the  
22 beginning of the footage with Mr. Heimbach?

23 A Well -- and I think I know what you're  
24 talking about. Yeah, I was there. I turned around  
25 and I could -- I could see that that, indeed, was me.

1 J.M. HILL

2 The one that we were speculating about earlier, that  
3 was me.

4 Q And then do you see, the second part of  
5 what we showed was League of the South people  
6 fighting with that woman, which is what we saw on  
7 Exhibit 29?

8 A Yes, I did -- I did see that.

9 Q And in that -- in this footage, can -- am  
10 I correct that the people fighting with her were  
11 League of the South people?

12 A I saw -- run the video back and stop it  
13 and let me -- I -- yeah, I know I saw one person.

14 Q And I want you to tell me if one of those  
15 gentleman isn't Mr. Baker. Here we go.

16 (Video Exhibit played.)

17 THE WITNESS: I don't see

18 Mr. Baker. I see, like, three people.

19 BY MR. LEVINE:

20 Q Hold on.

21 A And one of them has a League emblem on  
22 his shirt, but that's not Mr. Baker. I don't see  
23 Mr. Baker in that --

24 Q Hold on.

25 A -- in that video.

1 J.M. HILL

2 Q Hold on. Right here (indicating). Hold  
3 on. Right there (indicating). Is that Mr. Baker,  
4 with the white beard?

5 A No, no, no. That's a man, I believe -- I  
6 know his last name is Hunter, H-U-N-T-E-R. I  
7 don't -- I can't remember his first name, but he's --  
8 that's not Mr. Baker, no.

9 Q Was he -- the man next to him with the  
10 black helmet, was he a member of the League of the  
11 South?

12 A Yes, he is, but I can't place him. I  
13 don't know who he is, I don't recognize the face, but  
14 he has a League on.

15 Q And was the man with the -- who do you  
16 think the man with the beard was?

17 A The man with the white beard in the  
18 center?

19 Q Yes.

20 A Yes, that man right there (indicating).  
21 I believe his last name is Hunter, H-U-N-T-E-R.

22 Q Is that William Hunter?

23 A It could be. I think there were three  
24 Hunters who were there and I get them all confused.

25 Q And right next to Mr. Hunter, on his

1 J.M. HILL

2 left, is a younger fellow with a tan baseball cap,  
3 also with a League of the South emblem on his shirt,  
4 correct?

5 A Yes, I think that may be one of his sons.

6 Q And is it one of his sons, then, that  
7 pepper sprays this woman?

8 A I don't know. Let's --

9 Q Let's watch.

10 A Yeah, that's what I was going to say.

11 (Video Exhibit played.)

12 BY MR. LEVINE:

13 Q Did you just see that?

14 A I did.

15 Q It takes place at one minute on the tape.  
16 So would it -- that gentleman -- that League of the  
17 South person right there pepper sprayed that woman,  
18 correct?

19 A From the video, it certainly appears so.

20 Q And that's what you would call an act of  
21 self defense, I take it?

22 Did you hear my question, Mr. Hill?

23 A No, sir, I didn't. What was your  
24 question?

25 Q Would you consider that an act of self

1 J.M. HILL

2 defense?

3 A I personally would not consider that an  
4 act of self defense.

5 Q Now, after -- later in that afternoon --  
6 I'm going to show you Exhibit 31.

7 (Hill Deposition Exhibit No. 31 was  
8 marked for the record.)

9 BY MR. LEVINE:

10 Q Right here (indicating) it -- do you see  
11 Exhibit -- what we marked as exhibit 31, that's a  
12 tweet by you, correct?

13 A Yes, as far as I know. It's from my old  
14 Twitter account. I don't have access to it anymore,  
15 but I believe that's an accurate tweet.

16 Q And where were you when you tweeted this?  
17 This is at 2:25 p.m.

18 A Yeah, I was probably back at the place  
19 that we were staying, Seven Oaks, outside of the city  
20 of Charlottesville. And at the time I had Twitter on  
21 my phone so I could make tweets on my phone wherever  
22 I was. So --

23 Q So you recall that this tweet was when  
24 you were back at the -- at your lodging area?

25 A No, I don't know if I made it on the way

J.M. HILL

back or after I got back. I'm not sure exactly what the timetable was of us getting back there.

But I know, more than likely, that was about, what, four hours or so -- three and a half hours after the event was declared an illegal assembly, and I think we had already made it back to our area, lodging area, by then. So I would say -- guessing -- it would probably have been after I got back there.

Q And your tweet was: The League of the South had a good day in Charlottesville, Virginia. Our warriors acquitted themselves as men. God be praised.

Correct?

A Yes, that is correct.

Q And you considered that day in Charlottesville a good day for League of the South?

A In retrospect, I would have considered it a better day if I had gotten to speak and we would have had the event, but I was just happy at that time that all of our people got out of their safely and that we went there to do our duty. So that was the underlying sentiment of my post on that day, as best as I remember.



1 J.M. HILL

2 Q Your sentiment, your statement -- The  
3 League of the South had a good day in  
4 Charlottesville. Our warriors acquitted themselves  
5 as men -- there's nothing in there about the fact  
6 that your men got out safely, is there?

7 A No, but that was implied, after we got  
8 everybody out. And I just made a short tweet. I  
9 wasn't going to go into a lot of details, but -- and  
10 I don't remember exactly what motivated me, but I do  
11 know that I was -- I had a great sense of relief when  
12 we got the last person accounted for and got out of  
13 there, because the streets were very dangerous in the  
14 aftermath of the break-up of the event.

15 Q Isn't it a fact, Mr. Hill, that when you  
16 wrote, Our warriors acquitted themselves as men, you  
17 were referring to the fact that the League of the  
18 South men took on the protesters physically and beat  
19 a number of them up?

20 A No, sir, I was not. I was referring to  
21 the fact that we went there, we went to the park to  
22 do our duty, and we got all of our people out of  
23 there safely and got back to our campsite. We -- we  
24 didn't leave anybody behind. We made sure that we  
25 stayed as long as was necessary to get everybody out.

1 J.M. HILL

2 We had several people who were injured,  
3 and that was -- that was the first and foremost thing  
4 on my mind, being thankful for all of us getting out  
5 of there and getting back to safety.

6 Q Acquitted generally means conducted  
7 themselves innocently, correct?

8 A Conducted themselves how, now? I didn't  
9 catch that word.

10 Q Well, how did -- is it your testimony  
11 that your words, Our warriors acquitted themselves as  
12 men, is not intended to imply at all that you were  
13 proud that your men engaged the counter protesters in  
14 violence?

15 A Well, I was -- I was very proud of our  
16 men, sir, for what they did in defending the  
17 defenseless. There were numerous -- there were  
18 numerous occasions --

19 Q Your men weren't defenseless, were they?

20 A No, I said our men were defending the  
21 defenseless.

22 Q Your men were -- where were the  
23 defenseless people that your men were defending? I'm  
24 not understanding, sir.

25 A Okay. Sir, give me a moment and I'll

J.M. HILL

tell you.

We got to the park and we defended the east entrance because if we hadn't defended it, we would have been swarmed by Antifa. There were, throughout the rest of the morning, isolated individuals and small groups of individuals, violent people -- meaning people coming to the Unite the Right event -- who got caught up in the crowd out there and were assaulted.

Our men went out in the crowd and rescued them and brought them back in and kept a number of people from being severely injured by Antifa and Black Lives Matter. And, yes, I was extremely proud of our members for protecting the defenseless from an offense like that.

Q So it's your testimony under oath, Mr. Hill, that your words in this tweet, Our warriors acquitted themselves as men, doesn't relate at all to the conduct of Mr. Tubbs and the group of League of South men, with shields, marching towards the park, through the protesters, and the melee that happened thereafter?

A I was very proud of our men for making it down Market Street and all the way into the park

1 J.M. HILL

2 against the opposition. I was very proud of that.  
3 They did acquit themselves well, and I would praise  
4 them again today.

5 But I was very proud, also, of the fact  
6 that they defended a bunch of defenseless people who  
7 were accosted by Antifa and Black Lives Matter in the  
8 street as they tried to reach the park. I was also  
9 very proud of our men for the leaving anybody behind  
10 after this was over.

11 And this was a chaotic and dangerous  
12 situation, sir. And I know you weren't there, but I  
13 was. So I was very proud of our men from beginning  
14 to end about what they did.

15 Q Understood, Mr. Hill.

16 So after the -- after you got back to  
17 the -- to the camp, did you learn about an incident  
18 in the garage with one of the League of the South  
19 members, Mr. Davis, Tyler Davis?

20 A Yes, I did. I don't know if I knew that  
21 Mr. Davis was involved right away, but I was  
22 informed, I believe, it was by Mr. Tubbs. I don't --  
23 I'm not completely sure of that.

24 But I did learn, after I got back to our  
25 place where we were staying, that there had been an

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altercation in the -- in the garage there. And I didn't know at the time that Mr. Davis was involved in it. I only found out later. I don't -- I can't remember when, but it was later that I found out he was involved in it.

Q And did you find out that evening or was it after you had left Charlottesville, about the garage incident with Mr. Davis?

A I learned about the garage incident that evening. I don't think that I learned about Mr. Davis being involved in it until sometime later on, and I don't really remember when that was, sir.

Q When you first learned of it, what did you hear?

A I heard that there had been an altercation on East Market Street, fairly close to the parking garage, where one of our people had been -- in fact, his name's Harold Crews -- had been assaulted and someone was trying to take his flag away. And they pulled them off to the side of the street. And somebody hit him in the side of the head with a mag light, and I think he had to go to the hospital.

And I heard in the aftermath of that, the

1 J.M. HILL

2 person who hit him in the side of the face was chased  
3 down and he was beaten, by a group -- I don't how  
4 many -- by a group of people, and I didn't know who  
5 they were. I didn't know if any of them were ours or  
6 not. It was very sketchy, the details I heard.

7 Q Did you learn that one of those people  
8 that beat the man was Tyler Davis?

9 A I learned that later. I don't think I  
10 knew that when I was actually there in  
11 Charlottesville. In fact, I don't think I knew who  
12 any of them were until sometime later on, and I  
13 really -- it's very unclear.

14 There was a lot going on in the aftermath  
15 of this, and I don't really recall when I learned  
16 that Mr. Davis was one of the people that were --  
17 that were charged in this -- in this incident.

18 Q You came to learn that he was one of the  
19 people who was charged, correct?

20 A I did eventually learn that, yes.

21 Q Did you ever see the video of the fight  
22 in the garage?

23 A I have seen a video. I don't know if  
24 I've seen all of them, but I've seen at least one.

25 Q I'm going to mark as Exhibit 32 a video

1 J.M. HILL

2 of the fight in the garage.

3 (Hill Deposition Exhibit No. 32 was  
4 marked for the record.)

5 BY MR. LEVINE:

6 Q Can you see it, sir?

7 A Not yet. It's not up yet. Still  
8 waiting. Oh, here we go.

9 (Video Exhibit played.)

10 BY MR. LEVINE:

11 Q Mr. Hill, did you -- can you identify the  
12 man with the khaki pants and the black shirt there in  
13 the middle as Tyler Davis?

14 A Everything's moving so quickly, sir, I  
15 can't -- I can't make -- I can't make any sense out  
16 of what I'm seeing.

17 Q Right there (indicating). Right there  
18 (indicating).

19 A Point the arrow, if you can, to the  
20 person you're talking about.

21 No, I can't identify that as Tyler Davis.  
22 I can't. I can't see his face. I can't see any  
23 emblem on the shirt.

24 Q Do you see people bashing that -- that's  
25 a black man, correct?

1 J.M. HILL

2 A From what I understand, yes. I'm -- I am  
3 really having trouble identifying much of anything.  
4 There are people going in front of the camera. But I  
5 presume that's Diondre Harris.

6 Q Okay. And you saw that he was beaten  
7 with shields; isn't that right?

8 A Go back. I -- I thought he was beaten  
9 with sticks or something. I didn't see a shield.

10 Q He was also beaten with flag poles, but  
11 I'm asking you if he was beaten with the shield.

12 A I don't know. I want to see the video  
13 again. I couldn't tell. Everything moves so  
14 quickly.

15 Q Right here (indicating).

16 A Where?

17 Q Right there (indicating).

18 A Well, that's not one of our shields.  
19 That's somebody else's. That's a clear shield. Ours  
20 were not clear.

21 Q I'm asking you if shields were used to  
22 beat him.

23 A Well, it appears that somebody there  
24 close to him has a shield. That's all I can see.  
25 But I can say this, it's not one of ours.



1 J.M. HILL

2 Q Now, is that -- that's a League of the  
3 South person in the middle on his knee, right?

4 A I don't know, sir. I can't see his face  
5 and I can't see any emblem on his shirt. And as I  
6 said, there were other people there that day who had  
7 black shirts and khaki pants who were not League  
8 members.

9 Q And do you see in the upper right-hand  
10 corner of the picture right now?

11 A Right.

12 Q Is that Mr. Tubbs?

13 A Sir, from what I can see, he is just in  
14 front of a gentleman that -- okay. It moved.

15 Q And you see right now --

16 A Yeah. Yes, yes. Mr. Tubbs is walking by  
17 on the other side, yes.

18 Q And do you see --

19 A Yes.

20 Q Do you see that gentleman with the League  
21 of the South emblem on his shirt?

22 A Yes, I see that. I think that probably  
23 is Mr. Davis. I had not met Mr. Davis before that  
24 day, so I'm not really familiar with his -- with his  
25 looks.

1 J.M. HILL

2 But that is a League of the South shirt,  
3 and I think Mr. Davis did have a Boonie hat on like  
4 that, that day --

5 Q Is that --

6 A -- so I would not --

7 Q Excuse me.

8 A Sure.

9 Q Other than Mr. Davis and Mr. Tubbs, is  
10 there anybody else from League of the South that you  
11 can identify in this picture, this video?

12 A Yeah, there was a gentleman -- if you can  
13 back the video up. I think he was standing to the  
14 right of Mr. Tubbs, before Mr. Tubbs walked across  
15 the front of that brick wall that we're looking at  
16 back there. Okay. Stop it right there. Go back.  
17 You've got to go back some.

18 Q Do you see him being hit with black --

19 A Okay. Stop. Ah. It always goes past  
20 where I'm trying to show you somebody, and he's only  
21 there just for a second.

22 Q That, right there (indicating).  
23 Mr. Tubbs is right -- standing over the beating,  
24 correct?

25 A No, he's not standing over the beating.

1 J.M. HILL

2 He's walking past the beating on the other side on  
3 that little walkway there. It looks like he's going  
4 back to try to find his car. He's -- he's several  
5 feet away from the beating.

6 He's walking away from it, sir.

7 Q Well, now, he is?

8 A Yes, he was walking away from it the  
9 whole time.

10 Q So is there anybody else from the League  
11 that you've identified in the video?

12 A There is one, but I can't -- I can't get  
13 it stopped quick enough to show you where he is and  
14 who he is.

15 Q Now --

16 A There (indicating) -- anyway, he was just  
17 behind -- and I can't get a good enough look at him  
18 to make sure I'm a hundred percent accurate, so I  
19 guess I'll just be quiet about it.

20 Q Did League of the South provide support  
21 and assistance to Mr. Davis?

22 A You know, I think that there was an  
23 attempt on the Florida League of the South to help  
24 him and his family when he lost his job after this  
25 happened. I don't know the extent to which any help,

1 J.M. HILL

2 if any, was given.

3 That would be something that Mr. Tubbs  
4 would know because he is -- in addition to being my  
5 chief of staff, he's our Florida League of the South  
6 state chairman. So that would have been a state  
7 matter that I would have not been involved in and  
8 wouldn't have been aware of.

9 Q And did you consider Mr. Davis's conduct  
10 there in participating in the beating of Mr. Harris  
11 to be an act of self defense?

12 A It was not an act of self defense, sir,  
13 but I do know why it happened, I believe. Because  
14 what you failed to show in that video is why Diondre  
15 Harris was jumped on in the first place. He had sent  
16 Harold Crews to the hospital. And I think, in the  
17 heat of the moment, these gentlemen from defending a  
18 friend who had been knocked out in the street out  
19 there previously.

20 So I think we need to have the whole  
21 context of this to be fair, sir.

22 Q So let me turn to Mr. Fields. You've  
23 heard about James Fields?

24 A Yes, I kept up with his case.

25 Q And were you on Fourth Street when

1 J.M. HILL

2 Mr. Fields drove his car into the crowd?

3 A I don't know exactly what time Mr. Fields  
4 drove his car into that crowd, but I do think that  
5 we -- if we weren't already back to our lodging, I  
6 think we were probably on the way. And if we were  
7 not on the way, we were all in the parking garage  
8 there by the police department on -- on East Market  
9 Street.

10 Q So, Mr. Hill, is the answer to my  
11 question you weren't -- you were not on Fourth Street  
12 when Mr. Fields drove his car into the crowd?

13 A All right. Let me clarify something. Is  
14 Fourth Street where this accident or the incident  
15 with Mr. Fields took place?

16 Q Yes.

17 A I don't think that any of us, to my  
18 knowledge -- and I don't know Charlottesville that  
19 well, but I don't think any of us were on that  
20 street. We -- we drove to East Market Street and --

21 Q Mr. Hill, I'm just trying to get a simple  
22 answer to a simple question. Were you --

23 A Well, sir, it's a simple question.

24 Q I'm asking you, sir, were you present on  
25 Fourth Street when Mr. Fields drove his car into the

1 J.M. HILL

2 crowd?

3 A No.

4 Q Okay. Thank you.

5 A Sure.

6 Q So you didn't observe that incident,  
7 correct?

8 A That is correct, sir. I did not observe  
9 it.

10 Q Did you talk to anybody, after the fact,  
11 who did observe it?

12 A No, sir. I've not talked to anyone, to  
13 the best of my recollection, who was there to observe  
14 this.

15 Q Did you watch any film or video of --

16 A Yes, sir.

17 Q -- the incident?

18 A Yes, sir, I did. I watched -- and I  
19 don't know how many -- whether it was just the same  
20 one over and over, but I saw the video more than  
21 once. As I said, I don't know if they were different  
22 videos or the same one, but yes, I did see video.

23 Q When did you first end up seeing a video?

24 A Sir, I can't remember. It was sometime  
25 after I got back from Charlottesville, and I don't

1 J.M. HILL

2 really remember if it was a week later, three or four  
3 days. I can't remember. It was subsequent to  
4 getting home from Charlottesville.

5 Q And did you come to learn, in watching  
6 the video, that Mr. Fields drove down Fourth Street,  
7 then backed his car out of Fourth Street to Market,  
8 and then drove back down into Fourth Street, into the  
9 crowd at like 30 miles an hour?

10 A No, sir. I didn't know the specifics of  
11 that. All I saw in the video was a car hitting some  
12 people and then backing up and a lot of confusion,  
13 and I didn't know exactly the order in which all of  
14 those things took place.

15 Q And did you -- did you end up attending  
16 Mr. Fields's trial?

17 A No, sir, I did not.

18 Q Did you read any of the transcript of the  
19 testimony at the trial?

20 A No, sir, I did not. All I read were news  
21 stories about it.

22 Q So you made some public comments about  
23 Fields's conviction; isn't that right?

24 A I can't remember, sir. I may have. I  
25 just -- I don't recall what they were or when they

1 J.M. HILL

2 were, but I may have.

3 Q So whatever comments you've made, they  
4 have been based on looking at the television videos  
5 and reading about the case in social media; is that  
6 right?

7 A Pretty much, pretty much. I would say  
8 seeing the videos and reading a lot of chatter and  
9 some news stories on social media, that would be  
10 where I would have got my information from, pretty  
11 much.

12 Q Have you -- have you come to learn that  
13 Mr. Fields came to Charlottesville, to the Unite the  
14 Right rally, dressed in the Vanguard America uniform  
15 and marched with Vanguard America?

16 A Yes, I was aware of that, from my -- from  
17 some of the on-line information I picked up on social  
18 media.

19 Q And do you know that Vanguard America  
20 representative, Mr. Rousseau, has testified that it  
21 permitted Mr. Fields to march with Vanguard America?

22 A No, I was not aware of that.

23 Q So you tweeted that James Fields did  
24 nothing wrong; isn't that right?

25 A I don't know, sir. As I said before, I



1 J.M. HILL

2 don't -- I can't remember what I may have put on  
3 social media about this issue. I just don't  
4 remember.

5 Q I think we have a video -- a tweet of you  
6 saying that Mr. Fields did nothing wrong.

7 You've taken that position, haven't you?

8 A Sir, I don't remember.

9 Q All right. Have you tweeted publicly at  
10 all about Mr. Fields?

11 A Sir, I cannot remember. I know I haven't  
12 done anything recently, and I can't remember if I  
13 tweeted anything or made any kind of comments about  
14 him subsequent to the event itself in  
15 Charlottesville. I don't know. I can't remember.

16 Q So after the -- the day ended and you  
17 went back to the campground or the lodging, was  
18 there -- did you have a social -- a social time with  
19 members of the League?

20 A Yes, we did. We sat around and ate and  
21 had some drinks. And we had a bonfire later that  
22 evening and entertained, and we sang some songs and  
23 things like that and were just trying to have a good  
24 time.

25 So, yes, we had a social time.

1 J.M. HILL

2 Q And when you got back to home -- how did  
3 you get from Charlottesville back to Alabama?

4 A I drove a vehicle. I drove a car.

5 Q And who was with you?

6 A I went by and picked Harold Crews up in  
7 North Carolina, Walkertown, North Carolina. Spent  
8 the night with him on that Thursday, that would have  
9 been the 10th. We drove up to Charlottesville on  
10 Friday, the 11th. And on Sunday, the 13th, I took  
11 Mr. Cruz back to his home in Walkertown, North  
12 Carolina, and I drove back to my home in Alabama on  
13 that same day.

14 Q And by that time, did you -- had you  
15 learned that Mr. Fields had actually killed one of  
16 the individuals on Fourth Street with his car?

17 A Sir, I can't remember the timetable of  
18 this. There's so much packed together in a short  
19 space and it's been almost three years ago.

20 I can't remember exactly when I first  
21 heard about Ms. Heyer's death, you know, in that  
22 incident there. I just can't remember when.

23 Q And would you agree with me that the  
24 national publicity of August 11th and 12th was very  
25 significant?

1 J.M. HILL

2 A Yeah, and there was a lot of -- not only  
3 national, but a lot of international publicity to  
4 this.

5 Q And the death of Heather Heyer -- the sad  
6 death of Heather Heyer was a national event; isn't  
7 that right?

8 A Yes, sir, it was.

9 Q And the participants at the alt-right  
10 took a lot of criticism in the national media for  
11 that event, correct?

12 A That is true.

13 Q And you were very interested -- it was  
14 important for you, as head of the League and one of  
15 the principal participants in the event, to give your  
16 own explanation for what happened and get that out  
17 into the public square; isn't that right?

18 A I think in a sense that is right because,  
19 you know, a controversial issue like this, you're  
20 almost forced to make some statement about it one way  
21 or the other. So -- but again, as far as the  
22 timetable goes, I don't remember exactly when I  
23 learned of all the details about this about Ms. Heyer  
24 and Mr. Fields.

25 I did know that there was some kind of

1 J.M. HILL

2 accident, but I didn't know the particulars of it  
3 until later and I --

4 Q I'm asking you --

5 A -- I'm not sure when that was.

6 Q I'm asking you, Mr. Hill, isn't it a fact  
7 that, as the president of the League of the South,  
8 you wanted to create a narrative on behalf of the  
9 League of the South, in the public square, that the  
10 violence by the League of the South and the other  
11 organizers was all in self defense?

12 A I was -- I wouldn't call it a narrative,  
13 sir. I would call it -- I would call it speaking the  
14 truth and giving our side of the story. Now, I'm not  
15 saying that everything that happened there that  
16 day -- because obviously when chaos happens, you  
17 can't account for everything that every single person  
18 does.

19 But I do know this, that from an  
20 organizational standpoint, sir, we went in there and  
21 came out, as I've discussed to you before, in as  
22 honorable way as I could foresee us doing under the  
23 circumstances. And when it was over, we told our  
24 side of the story.

25 Now, you could call that a narrative if

1 J.M. HILL

2 you want to, but we told our side of the story from  
3 our perspective.

4 Q Even -- even though you asked your men to  
5 go to battle in Charlottesville, you wanted to claim  
6 that all of the violence was in self defense; isn't  
7 that right?

8 A The violence that occurred there that day  
9 was so disparate, there were so many little  
10 incidents, sir, that I can't say what happened on  
11 every occasion, every confrontation. But I can tell  
12 you this, that, in general, we went in there and we  
13 defended ourselves, we defended our rights and I was  
14 very happy with the way that we did that.

15 Now, were there some incidences where a  
16 person in the heat of battle -- and that's what it  
17 was, sir. It developed into a battle there. You saw  
18 it, you've seen it on the video.

19 I can't account for what every single  
20 person did, but I can account for the organization in  
21 general, and I was very happy with the way things  
22 turned out for us. It was a tragic day, of course,  
23 but we got in and got out and, under the  
24 circumstances, to me, that was a very successful day.

25 I wish we could have spoken. I wish the

1 J.M. HILL

2 event had gone on. It didn't, but that is -- it is  
3 what it is.

4 Q You actually called the people in the  
5 League of the South and the public to go to do battle  
6 at Charlottesville; isn't that right? Before the  
7 events?

8 A Those may have been my words but, as I've  
9 told you before, sir, doing battle is a euphemism for  
10 fighting for your rights and fighting for a cause.  
11 And that can be -- that can take on many forms, sir.  
12 I was not advocating violence at all, only in self  
13 defense.

14 Q You understand how people could have  
15 misunderstood the meaning of your words?

16 A Sir, I do not take responsibility for  
17 what other people determine my words to mean. I know  
18 what they mean. Other people can determine them for  
19 themselves, I don't have any control over that.

20 Q But as the president of an organization  
21 that's responsible for its conduct, you must  
22 understand you have to take into consideration what  
23 some of your members might understand your words to  
24 mean; isn't that true?

25 A It could be true in certain

1 J.M. HILL

2 circumstances, sir. I'm not saying that it was or it  
3 wasn't in this one, but it's -- it's certainly a  
4 possibility.

5 Q So take a look at Exhibit 14. I'm going  
6 to put it back up on the screen.

7 Do you see this?

8 A Yes, I see it.

9 Q And this is dated August 23rd, 2017,  
10 correct?

11 A That's correct, yes.

12 Q And this was authored by you and put on  
13 the League of the South website, correct?

14 A That is correct, sir.

15 Q And you wrote this to put out in the  
16 public square your explanation of what the League of  
17 the South did on August 12th, correct?

18 A That is correct. It was this -- this was  
19 our side of the story, as it were.

20 Q And did you talk to Brad Griffin about  
21 this before you published it?

22 A I can't remember, sir, if I did. I know  
23 that Brad published something on his own website or  
24 blog, and we picked it up and republished it on ours,  
25 but I don't know if that was subsequent to mine or

1 J.M. HILL

2 before it. And I didn't talk to him about what I  
3 wrote. This was a completely independent,  
4 stand-alone piece from me.

5 Q And did he edit it at all?

6 A What? The one that I'm looking at on the  
7 screen?

8 Q Yep. Yes, sir.

9 A No, he didn't edit this. I don't have  
10 anybody edit myself except my editor, and he's not my  
11 editor.

12 Q Who is your editor, sir?

13 A My editor is my office manager and the  
14 person who edits our publication, the Free Magnolia.

15 Q And who is that?

16 A That is my wife.

17 But no, she didn't -- she didn't edit  
18 this. I'm just saying, if anybody ever edits any of  
19 my stuff, it would be her. But Brad Griffin did not  
20 have any hand in writing this.

21 Q Is there any reference in this to the  
22 assault on Diondre Harris?

23 A I don't think so.

24 Q Does this say anywhere that the violence  
25 with the -- with the Black Lives Matter people was on



1 J.M. HILL

2 a public street?

3 A I don't think it does. I haven't read  
4 down to the bottom of it. I can't see the bottom of  
5 this, but I don't think I mentioned that.

6 Q Did you know at the time that the permit  
7 for the Unite the Right rally was only for the park  
8 and did not include any of the public streets?

9 A I guess implicitly I knew that. But we  
10 weren't having any kind of demonstration in the  
11 public streets other than trying to get to the park.  
12 So -- but I guess implicitly I did know that, that it  
13 was for the park.

14 Q And not for the street?

15 A Yeah, as I say, implicitly. I really  
16 didn't think about it because we never planned to  
17 have anything in the street anyway. It just evolved  
18 into the street when the chaos broke out.

19 Q Except did you invoked your right to the  
20 public street by pushing and shoving and beating up  
21 the protesters that were in your way to get to the  
22 park; isn't that right?

23 A I deny that we pushed and shoved and beat  
24 up, but we -- we were exercising our right, there,  
25 sir, to get to the park. I mean, this is a bit

J.M. HILL

disingenuous, sir. We had to get to the park in order to have our rally at the park.

So, you know, you just can't miraculously appear there. We had to go down the street and the street was blocked by these mass protesters, and the cops did nothing about it. So, you know, what happened happened.

We weren't having any demonstration on the street, sir. We were on our way using a street for its proper function, which is to get from point A to point B.

Q Isn't it a fact that you put this narrative out to get your side of the story of self defense into the public square?

A We -- yes, we -- we put the narrative out to get our side of the story out there to the public, obviously. That's what you do. That's what the other side is doing.

Q Now, did you end up doing a podcast with -- with Harold Crews sometime after the Charlottesville events?

A Well, I'm sure I did. I was a fairly regular guest on his podcast, but I can't remember the exact dates of these things.

1 J.M. HILL

2 Q And do you remember saying publicly on  
3 that podcast -- and at other times -- that you  
4 couldn't be happier with the way August 12th turned  
5 out and that you accomplished your mission?

6 A I don't remember the exact words that I  
7 said. I have may have said something to the effect  
8 that -- that I was proud of the way that our people  
9 acted and behaved themselves, and I was proud of the  
10 fact that we went.

11 Obviously, it would have been much better  
12 if there had been no violence, and it would have been  
13 much better if we got to give our speeches, but --  
14 but, no, I don't remember the exact things that I  
15 said. This was a -- you know, an audio thing and  
16 nothing was written down. It was kind of  
17 extemporaneous, so I don't remember.

18 Q So I'm going to play for you part of the  
19 podcast with Mr. Cruz from -- from August 23rd, 2017,  
20 right about -- the same day that you published on the  
21 website your explanation.

22 A Okay.

23 AUDIO EXHIBIT PLAYED: (Well, I'll  
24 tell you, it's been an eventful, what, 11  
25 days or so, here since the rally there in

J.M. HILL

Charlottesville on the 12th of August. A lot has transpired and I couldn't -- I couldn't be happier with the outcome of this for the League. I know that the rally itself was cut short, never allowed to happen, but, in retrospect, you kind of look back on it and say, yeah, it was a set-up, but there's really no way of knowing that until you go in there and kind of walk into the -- into the lion's den, as it were. And we did that because it was our duty to do it. We promised that we would be there, you know, way back in the spring when I was asked by the organizer to come and speak. I accepted and talked to our League officers and we accepted this as an organization, an opportunity to go up there and stand in defense of the monument to one of our heros, General Lee, and to have a platform for putting out our southern nationalist message. And we look forward to cooperating with our allies in the Nationalist Front. And

1 J.M. HILL

2 we did all those things and we had a good  
3 operational plan, thanks to our  
4 operations chief, Ike Baker. And things  
5 certainly looked well on the ground for  
6 us, thanks largely to Mike Tubbs, our  
7 chief of staff, Spencer Borham, our  
8 column leader and all of our brave --  
9 brave warriors s who refused to have  
10 their way barred to the park. So it was  
11 a great --)

12 BY MR. LEVINE:

13 Q So you said, I think, Mr. Tubbs --  
14 Mr. Hill, that you accomplished the mission.

15 What was the mission?

16 A Well, the mission was to go -- it's  
17 something I've said in a previous writing that you  
18 put on the screen. The first was to go there to  
19 defend our southern cultural heritage, and the second  
20 was to go and spread our southern nationalist  
21 message.

22 And one of the things that obviously  
23 that, you know, you're not aware of is the fact that  
24 we got a lot of publicity out of this, we got a lot  
25 of new members from it, because of the high profile

1 J.M. HILL

2 nature of the story. So that was, in part, what I  
3 was talking about there when I said we accomplished a  
4 lot. This was viewed all over the world.

5 Q And you got -- and you got new members  
6 because they saw your group physically taking on the  
7 Black Lives Matter protesters; isn't that right?

8 A Sir, I don't know. I don't -- I'm not  
9 privy to the reasons that everybody would make a  
10 decision to join our organization.

11 I do know that some of them said, you  
12 know, y'all -- y'all went and did your duty in  
13 Charlottesville and real proud of you and I'd like to  
14 be part of this. So, yeah --

15 Q Other than the violence that took place  
16 by -- that Mr. Tubbs and the rest of the league of  
17 the South warriors engaged in, what else happened  
18 that day that you are -- that is core to your mission  
19 that made you say that you accomplished your mission?

20 A Sir, I've said this several times now.

21 We went to do our duty and, under the  
22 chaotic circumstances, we did our duty, and we  
23 brought everybody out of there safe and sound,  
24 although some were injured. And that, in and of  
25 itself, was an accomplishment. And people saw that

1 J.M. HILL

2 and they were proud of us.

3 People on our side said that we did the  
4 right thing by going. And, I guess, against pretty  
5 good odds. We were outnumbered and they were -- they  
6 were very happy to see somebody standing up for their  
7 heritage and their civilization. And they said so  
8 and they joined, so it was a good day, considering  
9 that.

10 Q It wasn't just standing up. It was  
11 engaging in the physical violence against them that  
12 rallied your troops; isn't that right?

13 A No, sir. It's not at all. It's the  
14 simple fact that we went and did our duty and did not  
15 back down, did not surrender our rights.

16 Q Mr. Hill -- Mr. Hill, you keep saying you  
17 went and did your duty. The rally never happened,  
18 the speeches never took place --

19 A Sir, that doesn't matter.

20 Q -- you never got an opportunity to  
21 express your views politically.

22 The only thing that happened was you  
23 ended up beating up the counter protesters. How is  
24 that doing your duty, sir?

25 A Sir, we went to do our duty --

1 J.M. HILL

2 MR. JONES: Object to form.

3 THE WITNESS: Pardon?

4 BY MR. LEVINE:

5 Q Excuse me? Please finish your answer.

6 A We went to the park to do our duty, sir.  
7 That's because we were asked to come and defend our  
8 cultural heritage, and the fact that we went in and  
9 of itself means that we did our duty.

10 Q Tell me --

11 MR. JONES: All right. Let's go  
12 off the record. We need to take a break.  
13 We've been going for long enough.

14 MR. LEVINE: Who is that?

15 MR. JONES: This is Bryan Jones.  
16 It can be five minutes if you don't want  
17 a long break.

18 MR. LEVINE: Okay. Five-minute  
19 break.

20 THE VIDEOGRAPHER: The time is  
21 4:49 p.m. We're off the record.

22 (Brief pause.)

23 THE VIDEOGRAPHER: the time is  
24 4:57 p.m. We're on the record.

25 BY MR. LEVINE:



1 J.M. HILL

2 Q So Mr. Hill, you testified earlier today  
3 that sometime in August 2018 you decided to  
4 disassociate from the national front, correct?

5 A Yes, around about that time. I'm not  
6 sure it was exactly August, but we made our decision  
7 somewhere in the summer, yes.

8 Q And one of the reasons, if not the  
9 reason, that you gave was that the nationalist  
10 socialist movement had publicized rallies that you  
11 were going to be jointly attending and it  
12 attracted -- or was going to attract protesters like  
13 Black Lives Matter and Antifa that you didn't want at  
14 your rally, correct?

15 A That is correct.

16 Q And isn't it a fact that, as a result of  
17 Charlottesville, you, on behalf of the League of the  
18 South, decided that you would do what are called  
19 flash rallies, where you would have rallies in  
20 friendly environs that were not announced publicly,  
21 that would not attract the Black Lives Matter and  
22 other protesters?

23 A Yes.

24 Q And that change in tactics was a product  
25 of the experience at Charlottesville in the Unite the

1 J.M. HILL

2 Right rally?

3 A In part, yes.

4 (Hill Deposition Exhibit No. 34 was  
5 marked for the record.)

6 BY MR. LEVINE:

7 Q Now, you also -- I'm going to mark as an  
8 exhibit Free Magnolia, Exhibit -- it will be Exhibit  
9 34. And it's Volume 13, No. 3.

10 Could you just take a look at it and  
11 identify it, please.

12 A Yes, that's it.

13 Q And this was published after the  
14 Charlottesville rally, correct?

15 A Yes, correct.

16 Q And this was written by you?

17 A Yes.

18 Q And was it edited by your wife?

19 A More than likely.

20 Q And the title of it is The New Red  
21 Terror, correct?

22 A The New Red Terror Part 2.

23 Q And the new red terror for you is the --  
24 referred to as the Judeo enemy, correct?

25 A I'm looking for that phrase, sir. Hold

1 J.M. HILL

2 on just a second.

3 Ah, yes, Communism. Judeo Bolshevism,  
4 Communism, synonymous.

5 Q And your view of the new red terror is  
6 that the Jews are the new red -- are the new red  
7 terror, correct?

8 A In part, just as the old red terror from  
9 a hundred years ago, and it seems to be taking on the  
10 same sort of shape.

11 Q And in one place in this piece that you  
12 wrote, you talk about: They can't have their way on  
13 our streets.

14 Do you see that?

15 A I will look for it. I don't see it with  
16 what's on my screen here.

17 Q Well, we'll find it.

18 Does that sound like words you would have  
19 used?

20 A Yeah, I wrote this.

21 Q So do you remember using the words: They  
22 can't have their way on our streets?

23 A I write so much that I don't remember  
24 using those exact words, but if it's in the article,  
25 I wrote it, but I don't see it yet. Could you point

1 J.M. HILL

2 it out to me, please.

3 Q I'm trying, sir. It's just hard to read.

4 A Yeah. Understood. I understand.

5 Q Do you remember saying that you wanted to  
6 sweep the red vermin off our streets?

7 A That -- I don't remember writing that,  
8 but if it's in this article, again, I wrote it, so  
9 I'll claim it. But I just -- I don't see it, so I'm  
10 waiting.

11 Q Look in the paragraph -- the second  
12 paragraph under Clamp Down?

13 A Okay. She's going to have to get --

14 Q Do you see it says -- right there it  
15 says: Moreover, since Charlottesville, the new red  
16 terror has exerted itself in the courts by using its  
17 connections to big money Jew law firms and paralegal  
18 NTOs to bring suits, not always for actual crimes  
19 committed, but for the Orwellian charge of wrong  
20 think.

21 Do you see that sentence?

22 A No, I don't, because it's -- it's not  
23 laid out where I can see it. There's just a small  
24 section in big letters that I'm looking at right now.  
25 She's going to have to reframe this for me to be able

1 J.M. HILL

2 to see it.

3 Q Now can you see this?

4 A I can see part of it. Hardly a corner of  
5 America's --

6 Q The paragraph right above that, sir.

7 A Okay. Well, it's -- it moved and now I  
8 don't know where it is. I'm not really seeing  
9 anything but just a few letters -- big letters here.  
10 So -- She had it earlier but she lost it.

11 Q Can you see this now? It's in yellow.  
12 It's highlighted.

13 A No, sir, I can't. Not what's on my  
14 screen here. I can't see that.

15 Q We'll reshare it. Hold on.

16 A Okay. That's better. I can see it now.

17 Q Does that sentence refer to your view of  
18 this lawsuit?

19 A I think -- I think it basically is a  
20 general statement regarding all the lawsuits that  
21 have been filed, regarding this and other places.  
22 So, yeah, that would be -- yes, but including others,  
23 as well.

24 Q Mr. Hill --

25 MR. LEVINE: Let's just go off the

1 J.M. HILL

2 record for a few minutes and then we'll  
3 come back on the record. I'm not going  
4 to take time on the record to find this.

5 THE VIDEOGRAPHER: The time is  
6 5:07 p.m. We're off the record.

7 (Brief pause.)

8 THE VIDEOGRAPHER: The time is  
9 5:17 p.m. We're on the record. It seems  
10 Mr. Hill has left us.

11 MR. LEVINE: Are you on, Mr. Hill?

12 THE WITNESS: Yes, I'm here. My  
13 battery in my phone is getting low and  
14 I'm charging it, but I think I'm fighting  
15 a losing battle, but I'll be here as long  
16 as I can.

17 MR. LEVINE: Well, we're almost  
18 done, sir.

19 THE WITNESS: Okay.

20 BY MR. LEVINE:

21 Q I want you to look at the -- have you  
22 written about the new red terror more than once?

23 A Yes, I did -- well, this is part two.  
24 This is -- in the subsequent -- in the previous issue  
25 of the Free Magnolia, I wrote the first part of this,

1 J.M. HILL

2 and in the subsequent one to this, I wrote another  
3 one. So I did three in all, in three different  
4 issues.

5 MR. LEVINE: I'm not sure,  
6 Mr. Jones, if these were produced by you.  
7 We would ask that all three segments be  
8 produced.

9 Bryan?

10 MR. JONES: You're asking Michael  
11 Hill to produce the Free Magnolia  
12 segment?

13 MR. LEVINE: On behalf of League of  
14 the South, yes.

15 MR. JONES: Okay. I'll make note  
16 of that.

17 MR. LEVINE: All three, all three  
18 segments. We have the second one here.  
19 We don't have the first or the third that  
20 he just testified.

21 THE WITNESS: That is correct. I  
22 have the first and the third that I can  
23 get to you.

24 MR. LEVINE: Thank you.

25

1 J.M. HILL

2 BY MR. LEVINE:

3 Q And the new red terror was the Judeo  
4 enemy, correct?

5 A In part; not completely, but in part.

6 Q And the -- your purpose was to prove to  
7 the Jews that they can't have their way on your  
8 streets; isn't that right?

9 A I wouldn't -- I wouldn't exactly put it  
10 that way. I would say that we are telling our people  
11 what we believe is a danger and we're warning them  
12 and we are trying to get them to organize politically  
13 and do something about it.

14 Q And if the words Sweep Red Vermin Off Our  
15 Streets, the red vermin would refer to the Jews,  
16 correct?

17 A In part, if they're communist. It would  
18 refer simply to communists, whoever the communists  
19 might be, but historically communism has been a  
20 Jewish ideology, largely.

21 Q So in the section From Southerner to  
22 Southern Nationalist in your piece, can you see that?

23 A Yes, I can.

24 Q This is making reference to the blood and  
25 soil nationalism of your movement, correct?



1 J.M. HILL

2 A Let me read this paragraph.

3 Yes, it is. I actually mention blood and  
4 soil nationalism. Yes, it is.

5 Q And your message here was to Jews that  
6 they were unwanted in the south; isn't that right?

7 A The message here is that southerners  
8 should rule the south. Regardless of who else is  
9 around, who else is threatening us, southerners need  
10 to become southern nationalists and rule their own  
11 territory, for their own benefit.

12 Q And that was to let the Jews -- also to  
13 let the Jews know that they were unwelcome in the  
14 south?

15 A If that's what -- if that's what they  
16 want to draw from this, I can't prevent them from  
17 drawing that conclusion from it, but southerners have  
18 to have a homeland and this is ours.

19 Q Well, isn't it a reasonable conclusion  
20 for a Jewish person in the south to draw?

21 A I don't know, sir, I'm not a Jewish  
22 person. And it goes back to the same question  
23 earlier that you asked me. I don't know how to put  
24 myself in somebody else's place and see the world the  
25 way they do, so I would say no, I can't see that.

1 J.M. HILL

2 Q The south, as far as you are concerned,  
3 were for the white nationalists and that's where you  
4 wanted them to live, spiritually and figuratively --  
5 spiritually and physically, together controlling and  
6 defending their own territory, correct?

7 A Yes, that is correct.

8 MR. LEVINE: I don't have any other  
9 questions today, Mr. Jones. I'm  
10 finished.

11 MR. JONES: I have no questions.  
12 We can end today.

13 MR. LEVINE: Thank you.

14 THE WITNESS: Very good.

15 MR. LEVINE: All done. Thank you,  
16 sir.

17 THE VIDEOGRAPHER: The time is  
18 5:24 p.m. We're off the record.

19

20 (Thereupon, the deposition was  
21 concluded at approximately 4:24 p.m.)

22

23

24

25

J.M. HILL

\_\_\_\_\_  
JAMES MICHAEL HILL

Subscribed and sworn to before me  
this\_\_\_\_\_ day of\_\_\_\_\_, 2020.

C E R T I F I C A T E

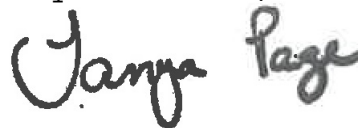
STATE OF ALABAMA:

JEFFERSON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to written page under my direction, that the preceding pages represent a true and correct transcript of the evidence given by said witness.

I further certify that I am not of kin or counsel to the parties in the case, am not in the regular employ of counsel for any of said parties, nor am I in any way financially interested in the result of said case.

Dated this 24th day of June, 2020.



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Tanya L. Verhoven-Page,  
Certified Court Reporter,  
B-1790.

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ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: Sines, et al. v. Kessler, et al.  
Dep. Date: June 18, 2020  
Deponent: James Michael Hill

CORRECTIONS

Pg.	Ln.	Now Reads	Should Read	Reason
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Pg.	Ln.	Now Reads	Should Read	Reason
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\_\_\_\_\_  
Signature of Deponent

SUBSCRIBED AND SWORN BEFORE ME

This the\_\_\_\_\_ day of\_\_\_\_\_, 2020.

\_\_\_\_\_

(Notary Public) My Commission Expires:\_\_\_\_\_